



UNITED STATES OF AMERICA
U.S. DEPARTMENT OF JUSTICE

United States Attorney's Office
Southern District of Georgia

CIVIL INVESTIGATIVE DEMAND
Interrogatories and Documents

TO: Alliance Park, LLC
P.O. Box 804
Allenhurst, GA 31401

CID No. 2023-012

This Civil Investigative Demand ("CID") is issued pursuant to the False Claims Act, 31 U.S.C. §§ 3729–3733, in the course of a False Claims Act investigation to determine whether there is or has been a violation of 31 U.S.C. § 3729, *et. seq.* This False Claims Act investigation concerns allegations that House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary, their employees, contractors, and agents, as well as other individuals or entities, violated or conspired to violate the False Claims Act by obtaining funds from the Department of Veterans Affairs for education and housing benefit programs to which they were not entitled. The general purpose of this CID is to discover information relating to these allegations and to determine whether House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary and their employees, contractors, and agents have violated the False Claims Act.

This is the original CID; no copies have been served on other parties.

You are hereby commanded to answer in writing the written interrogatories attached hereto as "Exhibit A" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), and submit such answers to Assistant United States Attorney Bradford C. Patrick at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. The written interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this CID. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.

You are further commanded to produce a copy of requested documentation identified hereto as "Exhibit B" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), to Assistant United States Attorney Bradford C. Patrick, at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. If you object to any document request, state your objection and set forth with particularity the reasons why the document was not produced on the certificate.

The following, as well as their supervisors, will serve as False Claims Act investigators and custodians to whom such material shall be made available: Assistant United States Attorney Bradford C. Patrick.

A response to this CID, including execution and return of the attached certification, is necessary to the conduct of the investigation. Failure to comply with any of the requirements of this CID will render you liable to proceedings in the United States District Court.

Issued under the authority of 31 U.S.C. § 3733 on this 19th day of October, 2023.

A handwritten signature in black ink, appearing to read "Jill E. Steinberg", is written over a horizontal line.

JILL E. STEINBERG
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF GEORGIA

DEFINITIONS

1. *Document* means any and all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations whether preserved in *hard-paper form* or stored in *digital form* in any medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form, and includes, but is not limited to, any and all originals, copies and reproductions (except for materials that are *de-duplicated* under the terms of this CID), *archived data*, and *backup data* of all records, papers, tables, charts, appointment calendars, schedules, journals, notes, memoranda, logs, manuals, reports, minutes, notices, bulletins, financial statements, balance sheets, ledgers, contracts, agreements, promissory notes, security agreements or other negotiable instruments, telegrams, facsimiles, telexes, wire transfers, films, microfilms, photographs, video files, slides, audio recordings, transcriptions, phone records, *communications* (including, but not limited to electronic communications), voice mail, computer files, or any other information or data compilations stored in *databases* or accessible through computer or other information retrieval systems, *e.g.*, Portable Digital Assistants (“PDAs”), together with instructions and all other materials necessary to use or interpret such data compilations, and other like or similar tangible things, regardless of the means of their preparation and use.
2. *Communication* means any transmission or exchange of information between two or more persons orally or in writing, whether by chance or design, and includes, without limitation, any conversation or discussion, whether by face-to-face encounter, by regular mail or courier, by telephone, or by other means of electronic communication, whether transmitted in interstate or intrastate commerce. *Communication* includes, but is not limited to:
 - a. *Email* (a/k/a *electronic mail* or *e-mail*): an electronic means for communicating information under specified conditions, generally in the form of text messages, through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.
 - b. *Text Messages* (a/k/a *texts* or *iMessages*): a form of electronic communication involving immediate communication between two or more users through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.
 - c. *Instant Messages* (a/k/a *IM*): a form of electronic communication involving immediate communication between two or more online users; *stored IM* communications are messages that are purposely stored on a client computer.

- d. *Header information*: distribution information associated with email such as *Sender, Recipient, Subject, Date and Time, cc: (carbon copy), bcc: (blind carbon copy)*.
 - e. *Parent email, parent items, and child files*: *parent email* refers to the content and substance of an electronic communication, including *header information*; *parent items* refers to the content and substance of items such as calendars, tasks, notes, etc.; *child files* refers to files attached to *parent files* or *parent items*.
 - f. *Social Media* means electronic communication by and between correspondents connected together using media such as blogs (e.g., Twitter), content communities (e.g., YouTube), or social networks (e.g., Facebook).
- 3. “And,” “or,” and “and/or” shall be construed either disjunctively or conjunctively so as to bring within the scope of this CID for documents any material which might otherwise be construed as outside the scope of this CID.
 - 4. “*Relating to*” or “*relate to*” or “*discussing*” means consisting of, referring to, reflecting, supporting, evidencing, discussing, describing, embodying, memorializing, containing, constituting, including, identifying, stating, studying, reporting, commenting, analyzing, setting forth, considering, recommending, concerning, pertaining or being relevant to, in whole or in part, prepared in connection with, used in preparation for, or being in any way legally, logically, or factually connected to the matter discussed.
 - 5. “*You*” or “*your*” means Alliance Park, LLC.
 - 6. The singular and plural forms of any word shall be construed interchangeably.
 - 7. “*Any*” shall be construed to include “*all*,” and “*all*” shall be construed to include “*any*.”
 - 8. “*Including*” shall be construed to mean “*including, but not limited to*.”
 - 9. The “*United States*” shall be construed to mean the United States of America, its agencies, departments, and representatives.

INSTRUCTIONS

1. This CID applies to all documents in your possession, custody, or control regardless of their location and regardless of whether such material is held by your current or former employees, including facility-level personnel, mid-level management personnel, upper-level management personnel, directors, officers, in-house IT specialists and technicians, IT specialists and technicians to whom digital services have been out-sourced, consultants, representatives, agents, and any and all other persons acting on your behalf. Information and materials sought by this CID shall also include information and materials within the possession, custody, or control of any of your agents, officers, or employees, or any person acting as your representative or on your behalf.
2. Unless otherwise specified, this CID applies to all documents in your possession, custody, or control from the period **from December 1, 2019 to the date of this CID's issuance**. Documents created prior to December 1, 2019, that have been used or relied on by you since December 1, 2019, or that describe any duties, obligations, or policies that were in effect after December 1, 2019, are within the time frame of this CID.
3. The relevant time period for the information requested by written interrogatories is **from December 1, 2019 to the date of this CID's issuance**. The interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this Demand. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.
4. If you become aware that you possess, have custody or control of additional documents responsive to this CID, you shall promptly produce such additional documents.
5. If you intend to withhold from production any document based upon a claim of legal privilege, work product, or any other protection from production:
 - a. Identify with particularity and in a written log each such document by date, author(s), addressee(s), recipient(s), title, subject matter, purpose, and present custody of each and every questioned document;
 - b. State with particularity the privilege, work product principle, or other legal protection upon which you are relying in claiming each and every questioned document should be withheld from production; and
 - c. State with particularity each and every fact supporting the claim of privilege(s), work product protection, or other legal

protection(s) from production.

6. Identify all responsive documents that have been lost, discarded, destroyed, altered, or spoiled. In so doing, state: (a) the type of document; (b) the date of its creation; (c) the approximate date it was lost, discarded, destroyed, altered, or spoiled; (d) the nature of the spoliation; (e) the cause of the spoliation; (f) whether the spoliation was purposeful, inadvertent, or accidental; and, (g) the identity of each person having knowledge about the document and about its spoliation.
7. All documents provided in response to this CID are to include all marginalia and post-its, as well as any attachments referred to or incorporated by the document. To the extent that documents are found attached to other documents, by means of paper clips, staples or other means of attachment, such documents shall be produced together in the condition in which they are found. All documents should be produced in the manner and format in which they are kept in the usual course of business. If documents are stored electronically, they should be produced in electronic format. If documents are stored in multiple formats, they should be produced in each format in which they are stored.
8. All documents provided in response to this CID are to be organized in such a manner that each document responsive to a particular request is grouped together and identified as being responsive to that request.
9. If no document exists that is responsive to a request, a written statement to that effect shall be provided at the time of production.
10. All hard copy documents shall be scanned and produced in electronic format.

EXHIBIT A – INTERROGATORIES

1. Identify all of Your current and former owners, shareholders, or unit-holders, including:
 - a. for each individual owner, shareholder, or unit-holder,
 - i. their name,
 - ii. their date of birth,
 - iii. their home address,
 - iv. their business address,
 - v. their social security number,
 - vi. the class of their investment, and
 - vii. the dates they held such an interest.
 - b. for each company, corporation, partnership, proprietorship, trust, or other entity-based owner,
 - i. the entity's name,
 - ii. the entity's address,
 - iii. the class of the entity's investment, and
 - iv. all individuals You know to have a direct or indirect interest in such entity.
2. Identify all addresses where You conduct business and, for each location, summarize the nature of the business conducted there.
3. Identify Your directors and corporate officers, both former and current, including for each individual:
 - a. their name,
 - b. their date of birth,
 - c. their home address,
 - d. their business address,
 - e. their social security number,
 - f. their title,
 - g. the dates held such title, and
 - h. a description of all powers, authorities, duties, and obligations associated with such title.
4. Identify all of Your current and former employees, contractors, and volunteers.
5. Identify Your current and former corporate parents, subsidiaries, and affiliates, to the extent such entities exist, and provide information sufficient to show the corporate structure of any such entities in relation to You.

6. Identify all investments and capital contributions, including the person or entity that made the investment.
7. Identify any real property in which You have or have had an ownership, leasehold, mortgage, or security interest, including for each such property identify:
 - a. the nature of Your interest,
 - b. the date You acquired such an interest,
 - c. the seller,
 - d. manner of sale,
 - e. the purchase price you paid to acquire such interest,
 - f. the terms of any payments due by or owed to you in connection with Your interest, and
 - g. if You have sold or otherwise disposed of the interest, the date and terms under which You sold or disposed of the interest.
8. Identify by name, address, and telephone number each and every domestic and foreign bank and/or financial institution in which You have or had an account, and provide the account number, type of account, and account balance.

EXHIBIT B - DOCUMENTS TO BE PRODUCED

1. Your certificate of incorporation, bylaws, rules, regulations, procedures, and all amendments thereto.
2. Your current organizational chart.
3. A copy of each unique past organizational chart.
4. One copy of each annual or other periodic report of Your company, separately for your company and each of its divisions or subsidiaries.
5. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each board of directors of Your company and of each committee or subgroup of each board.
6. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each committee, group or subgroup of management employees of Your company, separately for your company and each of its divisions or subsidiaries.
7. All records of purchase, sale, mortgage, or lease of an interest in the properties identified in response to Interrogatory 7.
8. All power of attorney documents in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
9. All documents and communications related to any power of attorney agreements in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
10. All employment, contractor, and volunteer agreements.
11. All communications with House of Prayer Bible Seminary, House of Prayer Christian Churches of America, Inc., including their officers, members, employees, agents, and volunteers.

CERTIFICATE OF COMPLIANCE

I have responsibility for producing the documents requested in Civil Investigative Demand No. CID 2023-012. I hereby certify that all the materials required by that Civil Investigative Demand that are in the possession, custody, or control of the entities to whom the Demand is directed have been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

PROOF OF SERVICE

I, Hunter Hinton, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on 12/15/23, I served an original executed copy of Civil Investigative Demand No. 2023-012 by

(CHECK ONE)

G ☒ Personal Delivery; or

G ☐ Certified/Registered Mail

to the following:

NAME Alliance Park, LLC
c/o Northwest Registered Agent Service, Inc.
8735 Dunwoody Place Ste N
Atlanta, GA 30350

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

12/15/23
DATE


SIGNATURE



UNITED STATES OF AMERICA
U.S. DEPARTMENT OF JUSTICE

United States Attorney's Office
Southern District of Georgia

CIVIL INVESTIGATIVE DEMAND
Interrogatories and Documents

TO: Brickyard Place LLC
2625 Piedmont Rd. NE
No. 56 412
Atlanta, GA 30324

CID No. 2023-013

This Civil Investigative Demand ("CID") is issued pursuant to the False Claims Act, 31 U.S.C. §§ 3729–3733, in the course of a False Claims Act investigation to determine whether there is or has been a violation of 31 U.S.C. § 3729, *et. seq.* This False Claims Act investigation concerns allegations that House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary, their employees, contractors, and agents, as well as other individuals or entities, violated or conspired to violate the False Claims Act by obtaining funds from the Department of Veterans Affairs for education and housing benefit programs to which they were not entitled. The general purpose of this CID is to discover information relating to these allegations and to determine whether House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary and their employees, contractors, and agents have violated the False Claims Act.

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You are hereby commanded to answer in writing the written interrogatories attached hereto as "Exhibit A" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), and submit such answers to Assistant United States Attorney Bradford C. Patrick at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. The written interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this CID. If you object to any

interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.

You are further commanded to produce a copy of requested documentation identified hereto as "Exhibit B" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), to Assistant United States Attorney Bradford C. Patrick, at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. If you object to any document request, state your objection and set forth with particularity the reasons why the document was not produced on the certificate.

The following, as well as their supervisors, will serve as False Claims Act investigators and custodians to whom such material shall be made available: Assistant United States Attorney Bradford C. Patrick.

A response to this CID, including execution and return of the attached certification, is necessary to the conduct of the investigation. Failure to comply with any of the requirements of this CID will render you liable to proceedings in the United States District Court.

Issued under the authority of 31 U.S.C. § 3733 on this 19th day of October, 2023.

A handwritten signature in black ink, appearing to read 'Jill E. Steinberg', is written over a horizontal line.

JILL E. STEINBERG
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF GEORGIA

DEFINITIONS

1. *Document* means any and all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations whether preserved in *hard-paper form* or stored in *digital form* in any medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form, and includes, but is not limited to, any and all originals, copies and reproductions (except for materials that are *de-duplicated* under the terms of this CID), *archived data*, and *backup data* of all records, papers, tables, charts, appointment calendars, schedules, journals, notes, memoranda, logs, manuals, reports, minutes, notices, bulletins, financial statements, balance sheets, ledgers, contracts, agreements, promissory notes, security agreements or other negotiable instruments, telegrams, facsimiles, telexes, wire transfers, films, microfilms, photographs, video files, slides, audio recordings, transcriptions, phone records, *communications* (including, but not limited to electronic communications), voice mail, computer files, or any other information or data compilations stored in *databases* or accessible through computer or other information retrieval systems, *e.g.*, Portable Digital Assistants (“PDAs”), together with instructions and all other materials necessary to use or interpret such data compilations, and other like or similar tangible things, regardless of the means of their preparation and use.
2. *Communication* means any transmission or exchange of information between two or more persons orally or in writing, whether by chance or design, and includes, without limitation, any conversation or discussion, whether by face-to-face encounter, by regular mail or courier, by telephone, or by other means of electronic communication, whether transmitted in interstate or intrastate commerce. *Communication* includes, but is not limited to:
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 - 5. “*You*” or “*your*” means Brickyard Place LLC.
 - 6. The singular and plural forms of any word shall be construed interchangeably.
 - 7. “*Any*” shall be construed to include “*all*,” and “*all*” shall be construed to include “*any*.”
 - 8. “*Including*” shall be construed to mean “*including, but not limited to*.”
 - 9. The “*United States*” shall be construed to mean the United States of America, its agencies, departments, and representatives.

INSTRUCTIONS

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2. Unless otherwise specified, this CID applies to all documents in your possession, custody, or control from the period **from December 1, 2019 to the date of this CID's issuance**. Documents created prior to December 1, 2019, that have been used or relied on by you since December 1, 2019, or that describe any duties, obligations, or policies that were in effect after December 1, 2019, are within the time frame of this CID.
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4. If you become aware that you possess, have custody or control of additional documents responsive to this CID, you shall promptly produce such additional documents.
5. If you intend to withhold from production any document based upon a claim of legal privilege, work product, or any other protection from production:
 - a. Identify with particularity and in a written log each such document by date, author(s), addressee(s), recipient(s), title, subject matter, purpose, and present custody of each and every questioned document;
 - b. State with particularity the privilege, work product principle, or other legal protection upon which you are relying in claiming each and every questioned document should be withheld from production; and
 - c. State with particularity each and every fact supporting the claim of privilege(s), work product protection, or other legal

protection(s) from production.

6. Identify all responsive documents that have been lost, discarded, destroyed, altered, or spoiled. In so doing, state: (a) the type of document; (b) the date of its creation; (c) the approximate date it was lost, discarded, destroyed, altered, or spoiled; (d) the nature of the spoliation; (e) the cause of the spoliation; (f) whether the spoliation was purposeful, inadvertent, or accidental; and, (g) the identity of each person having knowledge about the document and about its spoliation.
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EXHIBIT A – INTERROGATORIES

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 - a. for each individual owner, shareholder, or unit-holder,
 - i. their name,
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 - iii. their home address,
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 - v. their social security number,
 - vi. the class of their investment, and
 - vii. the dates they held such an interest.
 - b. for each company, corporation, partnership, proprietorship, trust, or other entity-based owner,
 - i. the entity's name,
 - ii. the entity's address,
 - iii. the class of the entity's investment, and
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 - f. their title,
 - g. the dates held such title, and
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5. Identify Your current and former corporate parents, subsidiaries, and affiliates, to the extent such entities exist, and provide information sufficient to show the corporate structure of any such entities in relation to You.

6. Identify all investments and capital contributions, including the person or entity that made the investment.
7. Identify any real property in which You have or have had an ownership, leasehold, mortgage, or security interest, including for each such property identify:
 - a. the nature of Your interest,
 - b. the date You acquired such an interest,
 - c. the seller,
 - d. manner of sale,
 - e. the purchase price you paid to acquire such interest,
 - f. the terms of any payments due by or owed to you in connection with Your interest, and
 - g. if You have sold or otherwise disposed of the interest, the date and terms under which You sold or disposed of the interest.
8. Identify by name, address, and telephone number each and every domestic and foreign bank and/or financial institution in which You have or had an account, and provide the account number, type of account, and account balance.

EXHIBIT B - DOCUMENTS TO BE PRODUCED

1. Your certificate of incorporation, bylaws, rules, regulations, procedures, and all amendments thereto.
2. Your current organizational chart.
3. A copy of each unique past organizational chart.
4. One copy of each annual or other periodic report of Your company, separately for your company and each of its divisions or subsidiaries.
5. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each board of directors of Your company and of each committee or subgroup of each board.
6. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each committee, group or subgroup of management employees of Your company, separately for your company and each of its divisions or subsidiaries.
7. All records of purchase, sale, mortgage, or lease of an interest in the properties identified in response to Interrogatory 7.
8. All power of attorney documents in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
9. All documents and communications related to any power of attorney agreements in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
10. All employment, contractor, and volunteer agreements.
11. All communications with House of Prayer Bible Seminary, House of Prayer Christian Churches of America, Inc., including their officers, members, employees, agents, and volunteers.

CERTIFICATE OF COMPLIANCE

I have responsibility for producing the documents requested in Civil Investigative Demand No. CID 2023-013. I hereby certify that all the materials required by that Civil Investigative Demand that are in the possession, custody, or control of the entities to whom the Demand is directed have been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

CERTIFICATE OF COMPLIANCE

I have responsibility for answering the written interrogatories requested in Civil Investigative Demand No. CID 2023-013. I hereby certify that all information required by that Civil Investigative Demand that is in the possession, custody, control, or knowledge of the entities to whom the Demand is directed has been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

PROOF OF SERVICE

I, _____, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on _____, I served an original executed copy of Civil Investigative Demand No. 2023-013 by

(CHECK ONE)

- ☐ Personal Delivery; or
- ☐ Certified/Registered Mail

to the following:

NAME Brickyard Place LLC
 2625 Piedmont Rd. NE
 No. 56 412
 Atlanta, GA 30324

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

DATE

SIGNATURE

PROOF OF SERVICE

I, Charles D. Sikes, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on 10/25/2023, I served an original executed copy of Civil Investigative Demand No. 2023-013 by

(CHECK ONE)

☐ Personal Delivery; or

☒ Certified/Registered Mail / 7021 2720 0003 1539 2169

to the following:

NAME Brickyard Place LLC
 2625 Piedmont Rd. NE
 No. 56 412
 Atlanta, GA 30324

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

10/25/2023

DATE

Charles D. Sikes

SIGNATURE

Tracking Number:

Remove X

70212720000315392169

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item has been delivered to an agent for final delivery in ATLANTA, GA 30324 on October 28, 2023 at 12:13 pm.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered to Agent

Delivered to Agent for Final Delivery

ATLANTA, GA 30324

October 28, 2023, 12:13 pm

[See All Tracking History](#)

Feedback

What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates

**USPS Tracking Plus®**

Product Information



See Less

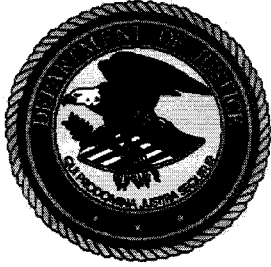
Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs



UNITED STATES OF AMERICA
U.S. DEPARTMENT OF JUSTICE

United States Attorney's Office
Southern District of Georgia

CIVIL INVESTIGATIVE DEMAND
Interrogatories and Documents

TO: Centex Management, LLC
PO Box 32
Allenhurst, GA

CID No. 2023-014

This Civil Investigative Demand ("CID") is issued pursuant to the False Claims Act, 31 U.S.C. §§ 3729–3733, in the course of a False Claims Act investigation to determine whether there is or has been a violation of 31 U.S.C. § 3729, *et. seq.* This False Claims Act investigation concerns allegations that House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary, their employees, contractors, and agents, as well as other individuals or entities, violated or conspired to violate the False Claims Act by obtaining funds from the Department of Veterans Affairs for education and housing benefit programs to which they were not entitled. The general purpose of this CID is to discover information relating to these allegations and to determine whether House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary and their employees, contractors, and agents have violated the False Claims Act.

This is the original CID; no copies have been served on other parties.

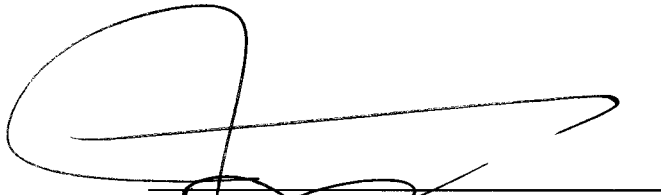
You are hereby commanded to answer in writing the written interrogatories attached hereto as "Exhibit A" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), and submit such answers to Assistant United States Attorney Bradford C. Patrick at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. The written interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this CID. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.

You are further commanded to produce a copy of requested documentation identified hereto as "Exhibit B" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), to Assistant United States Attorney Bradford C. Patrick, at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. If you object to any document request, state your objection and set forth with particularity the reasons why the document was not produced on the certificate.

The following, as well as their supervisors, will serve as False Claims Act investigators and custodians to whom such material shall be made available: Assistant United States Attorney Bradford C. Patrick.

A response to this CID, including execution and return of the attached certification, is necessary to the conduct of the investigation. Failure to comply with any of the requirements of this CID will render you liable to proceedings in the United States District Court.

Issued under the authority of 31 U.S.C. § 3733 on this 19th day of October, 2023.

A handwritten signature in black ink, appearing to read "Jill E. Steinberg", written over a horizontal line.

JILL E. STEINBERG
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF GEORGIA

DEFINITIONS

1. *Document* means any and all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations whether preserved in *hard-paper form* or stored in *digital form* in any medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form, and includes, but is not limited to, any and all originals, copies and reproductions (except for materials that are *de-duplicated* under the terms of this CID), *archived data*, and *backup data* of all records, papers, tables, charts, appointment calendars, schedules, journals, notes, memoranda, logs, manuals, reports, minutes, notices, bulletins, financial statements, balance sheets, ledgers, contracts, agreements, promissory notes, security agreements or other negotiable instruments, telegrams, facsimiles, telexes, wire transfers, films, microfilms, photographs, video files, slides, audio recordings, transcriptions, phone records, *communications* (including, but not limited to electronic communications), voice mail, computer files, or any other information or data compilations stored in *databases* or accessible through computer or other information retrieval systems, *e.g.*, Portable Digital Assistants (“PDAs”), together with instructions and all other materials necessary to use or interpret such data compilations, and other like or similar tangible things, regardless of the means of their preparation and use.
2. *Communication* means any transmission or exchange of information between two or more persons orally or in writing, whether by chance or design, and includes, without limitation, any conversation or discussion, whether by face-to-face encounter, by regular mail or courier, by telephone, or by other means of electronic communication, whether transmitted in interstate or intrastate commerce. *Communication* includes, but is not limited to:
 - a. *Email* (a/k/a *electronic mail* or *e-mail*): an electronic means for communicating information under specified conditions, generally in the form of text messages, through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.
 - b. *Text Messages* (a/k/a *texts* or *iMessages*): a form of electronic communication involving immediate communication between two or more users through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.
 - c. *Instant Messages* (a/k/a *IM*): a form of electronic communication involving immediate communication between two or more online users; *stored IM* communications are messages that are purposely stored on a client computer.

- d. *Header information*: distribution information associated with email such as *Sender, Recipient, Subject, Date and Time, cc: (carbon copy), bcc: (blind carbon copy)*.
 - e. *Parent email, parent items, and child files*: *parent email* refers to the content and substance of an electronic communication, including *header information*; *parent items* refers to the content and substance of items such as calendars, tasks, notes, etc.; *child files* refers to files attached to *parent files* or *parent items*.
 - f. *Social Media* means electronic communication by and between correspondents connected together using media such as blogs (e.g., Twitter), content communities (e.g., YouTube), or social networks (e.g., Facebook).
- 3. “*And*,” “*or*,” and “*and/or*” shall be construed either disjunctively or conjunctively so as to bring within the scope of this CID for documents any material which might otherwise be construed as outside the scope of this CID.
 - 4. “*Relating to*” or “*relate to*” or “*discussing*” means consisting of, referring to, reflecting, supporting, evidencing, discussing, describing, embodying, memorializing, containing, constituting, including, identifying, stating, studying, reporting, commenting, analyzing, setting forth, considering, recommending, concerning, pertaining or being relevant to, in whole or in part, prepared in connection with, used in preparation for, or being in any way legally, logically, or factually connected to the matter discussed.
 - 5. “*You*” or “*your*” means Centex Management, LLC.
 - 6. The singular and plural forms of any word shall be construed interchangeably.
 - 7. “*Any*” shall be construed to include “*all*,” and “*all*” shall be construed to include “*any*.”
 - 8. “*Including*” shall be construed to mean “*including, but not limited to*.”
 - 9. The “*United States*” shall be construed to mean the United States of America, its agencies, departments, and representatives.

INSTRUCTIONS

1. This CID applies to all documents in your possession, custody, or control regardless of their location and regardless of whether such material is held by your current or former employees, including facility-level personnel, mid-level management personnel, upper-level management personnel, directors, officers, in-house IT specialists and technicians, IT specialists and technicians to whom digital services have been out-sourced, consultants, representatives, agents, and any and all other persons acting on your behalf. Information and materials sought by this CID shall also include information and materials within the possession, custody, or control of any of your agents, officers, or employees, or any person acting as your representative or on your behalf.
2. Unless otherwise specified, this CID applies to all documents in your possession, custody, or control from the period **from December 1, 2019 to the date of this CID's issuance**. Documents created prior to December 1, 2019, that have been used or relied on by you since December 1, 2019, or that describe any duties, obligations, or policies that were in effect after December 1, 2019, are within the time frame of this CID.
3. The relevant time period for the information requested by written interrogatories is **from December 1, 2019 to the date of this CID's issuance**. The interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this Demand. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.
4. If you become aware that you possess, have custody or control of additional documents responsive to this CID, you shall promptly produce such additional documents.
5. If you intend to withhold from production any document based upon a claim of legal privilege, work product, or any other protection from production:
 - a. Identify with particularity and in a written log each such document by date, author(s), addressee(s), recipient(s), title, subject matter, purpose, and present custody of each and every questioned document;
 - b. State with particularity the privilege, work product principle, or other legal protection upon which you are relying in claiming each and every questioned document should be withheld from production; and
 - c. State with particularity each and every fact supporting the claim of privilege(s), work product protection, or other legal

protection(s) from production.

6. Identify all responsive documents that have been lost, discarded, destroyed, altered, or spoiled. In so doing, state: (a) the type of document; (b) the date of its creation; (c) the approximate date it was lost, discarded, destroyed, altered, or spoiled; (d) the nature of the spoliation; (e) the cause of the spoliation; (f) whether the spoliation was purposeful, inadvertent, or accidental; and, (g) the identity of each person having knowledge about the document and about its spoliation.
7. All documents provided in response to this CID are to include all marginalia and post-its, as well as any attachments referred to or incorporated by the document. To the extent that documents are found attached to other documents, by means of paper clips, staples or other means of attachment, such documents shall be produced together in the condition in which they are found. All documents should be produced in the manner and format in which they are kept in the usual course of business. If documents are stored electronically, they should be produced in electronic format. If documents are stored in multiple formats, they should be produced in each format in which they are stored.
8. All documents provided in response to this CID are to be organized in such a manner that each document responsive to a particular request is grouped together and identified as being responsive to that request.
9. If no document exists that is responsive to a request, a written statement to that effect shall be provided at the time of production.
10. All hard copy documents shall be scanned and produced in electronic format.

EXHIBIT A – INTERROGATORIES

1. Identify all of Your current and former owners, shareholders, or unit-holders, including:
 - a. for each individual owner, shareholder, or unit-holder,
 - i. their name,
 - ii. their date of birth,
 - iii. their home address,
 - iv. their business address,
 - v. their social security number,
 - vi. the class of their investment, and
 - vii. the dates they held such an interest.
 - b. for each company, corporation, partnership, proprietorship, trust, or other entity-based owner,
 - i. the entity's name,
 - ii. the entity's address,
 - iii. the class of the entity's investment, and
 - iv. all individuals You know to have a direct or indirect interest in such entity.
2. Identify all addresses where You conduct business and, for each location, summarize the nature of the business conducted there.
3. Identify Your directors and corporate officers, both former and current, including for each individual:
 - a. their name,
 - b. their date of birth,
 - c. their home address,
 - d. their business address,
 - e. their social security number,
 - f. their title,
 - g. the dates held such title, and
 - h. a description of all powers, authorities, duties, and obligations associated with such title.
4. Identify all of Your current and former employees, contractors, and volunteers.
5. Identify Your current and former corporate parents, subsidiaries, and affiliates, to the extent such entities exist, and provide information sufficient to show the corporate structure of any such entities in relation to You.

6. Identify all investments and capital contributions, including the person or entity that made the investment.
7. Identify any real property in which You have or have had an ownership, leasehold, mortgage, or security interest, including for each such property identify:
 - a. the nature of Your interest,
 - b. the date You acquired such an interest,
 - c. the seller,
 - d. manner of sale,
 - e. the purchase price you paid to acquire such interest,
 - f. the terms of any payments due by or owed to you in connection with Your interest, and
 - g. if You have sold or otherwise disposed of the interest, the date and terms under which You sold or disposed of the interest.
8. Identify by name, address, and telephone number each and every domestic and foreign bank and/or financial institution in which You have or had an account, and provide the account number, type of account, and account balance.

EXHIBIT B - DOCUMENTS TO BE PRODUCED

1. Your certificate of incorporation, bylaws, rules, regulations, procedures, and all amendments thereto.
2. Your current organizational chart.
3. A copy of each unique past organizational chart.
4. One copy of each annual or other periodic report of Your company, separately for your company and each of its divisions or subsidiaries.
5. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each board of directors of Your company and of each committee or subgroup of each board.
6. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each committee, group or subgroup of management employees of Your company, separately for your company and each of its divisions or subsidiaries.
7. All records of purchase, sale, mortgage, or lease of an interest in the properties identified in response to Interrogatory 7.
8. All power of attorney documents in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
9. All documents and communications related to any power of attorney agreements in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
10. All employment, contractor, and volunteer agreements.
11. All communications with House of Prayer Bible Seminary, House of Prayer Christian Churches of America, Inc., including their officers, members, employees, agents, and volunteers.

CERTIFICATE OF COMPLIANCE

I have responsibility for producing the documents requested in Civil Investigative Demand No. CID 2023-014. I hereby certify that all the materials required by that Civil Investigative Demand that are in the possession, custody, or control of the entities to whom the Demand is directed have been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

PROOF OF SERVICE

I, Hunter Hinton, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on 12/15/23, I served an original executed copy of Civil Investigative Demand No. 2023-014 by

(CHECK ONE)

G ☒ Personal Delivery; or

G ☐ Certified/Registered Mail

to the following:

NAME Centex Management, LLC
c/o United States Corporation Agents, Inc.
11175 Cicero Drive Suite 100
Alpharetta, GA 30022

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

12/15/23
DATE


SIGNATURE



UNITED STATES OF AMERICA
U.S. DEPARTMENT OF JUSTICE

United States Attorney's Office
Southern District of Georgia

CIVIL INVESTIGATIVE DEMAND
Interrogatories and Documents

TO: Deerwood Point LLC
5501 Abercorn Street
Unit 5-201
Savannah, GA 31405

CID No. 2023-015

This Civil Investigative Demand ("CID") is issued pursuant to the False Claims Act, 31 U.S.C. §§ 3729–3733, in the course of a False Claims Act investigation to determine whether there is or has been a violation of 31 U.S.C. § 3729, *et. seq.* This False Claims Act investigation concerns allegations that House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary, their employees, contractors, and agents, as well as other individuals or entities, violated or conspired to violate the False Claims Act by obtaining funds from the Department of Veterans Affairs for education and housing benefit programs to which they were not entitled. The general purpose of this CID is to discover information relating to these allegations and to determine whether House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary and their employees, contractors, and agents have violated the False Claims Act.

This is the original CID; no copies have been served on other parties.

You are hereby commanded to answer in writing the written interrogatories attached hereto as "Exhibit A" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), and submit such answers to Assistant United States Attorney Bradford C. Patrick at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. The written interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this CID. If you object to any

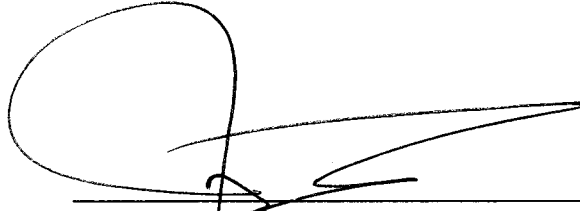
interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.

You are further commanded to produce a copy of requested documentation identified hereto as "Exhibit B" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), to Assistant United States Attorney Bradford C. Patrick, at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. If you object to any document request, state your objection and set forth with particularity the reasons why the document was not produced on the certificate.

The following, as well as their supervisors, will serve as False Claims Act investigators and custodians to whom such material shall be made available: Assistant United States Attorney Bradford C. Patrick.

A response to this CID, including execution and return of the attached certification, is necessary to the conduct of the investigation. Failure to comply with any of the requirements of this CID will render you liable to proceedings in the United States District Court.

Issued under the authority of 31 U.S.C. § 3733 on this 19th day of October, 2023.

A handwritten signature in black ink, appearing to read 'Jill E. Steinberg', is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long, sweeping tail.

JILL E. STEINBERG
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF GEORGIA

DEFINITIONS

1. *Document* means any and all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations whether preserved in *hard-paper form* or stored in *digital form* in any medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form, and includes, but is not limited to, any and all originals, copies and reproductions (except for materials that are *de-duplicated* under the terms of this CID), *archived data*, and *backup data* of all records, papers, tables, charts, appointment calendars, schedules, journals, notes, memoranda, logs, manuals, reports, minutes, notices, bulletins, financial statements, balance sheets, ledgers, contracts, agreements, promissory notes, security agreements or other negotiable instruments, telegrams, facsimiles, telexes, wire transfers, films, microfilms, photographs, video files, slides, audio recordings, transcriptions, phone records, *communications* (including, but not limited to electronic communications), voice mail, computer files, or any other information or data compilations stored in *databases* or accessible through computer or other information retrieval systems, *e.g.*, Portable Digital Assistants (“PDAs”), together with instructions and all other materials necessary to use or interpret such data compilations, and other like or similar tangible things, regardless of the means of their preparation and use.

2. *Communication* means any transmission or exchange of information between two or more persons orally or in writing, whether by chance or design, and includes, without limitation, any conversation or discussion, whether by face-to-face encounter, by regular mail or courier, by telephone, or by other means of electronic communication, whether transmitted in interstate or intrastate commerce. *Communication* includes, but is not limited to:
 - a. *Email* (a/k/a *electronic mail* or *e-mail*): an electronic means for communicating information under specified conditions, generally in the form of text messages, through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.

 - b. *Text Messages* (a/k/a *texts* or *iMessages*): a form of electronic communication involving immediate communication between two or more users through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.

 - c. *Instant Messages* (a/k/a *IM*): a form of electronic communication involving immediate communication between two or more online users; *stored IM* communications are messages that are purposely stored on a client computer.

- d. *Header information*: distribution information associated with email such as *Sender*, *Recipient*, *Subject*, *Date* and *Time*, *cc*: (*carbon copy*), *bcc*: (*blind carbon copy*).
 - e. *Parent email*, *parent items*, and *child files*: *parent email* refers to the content and substance of an electronic communication, including *header information*; *parent items* refers to the content and substance of items such as calendars, tasks, notes, etc.; *child files* refers to files attached to *parent files* or *parent items*.
 - f. *Social Media* means electronic communication by and between correspondents connected together using media such as blogs (e.g., Twitter), content communities (e.g., YouTube), or social networks (e.g., Facebook).
- 3. “*And*,” “*or*,” and “*and/or*” shall be construed either disjunctively or conjunctively so as to bring within the scope of this CID for documents any material which might otherwise be construed as outside the scope of this CID.
 - 4. “*Relating to*” or “*relate to*” or “*discussing*” means consisting of, referring to, reflecting, supporting, evidencing, discussing, describing, embodying, memorializing, containing, constituting, including, identifying, stating, studying, reporting, commenting, analyzing, setting forth, considering, recommending, concerning, pertaining or being relevant to, in whole or in part, prepared in connection with, used in preparation for, or being in any way legally, logically, or factually connected to the matter discussed.
 - 5. “*You*” or “*your*” means Deerwood Point LLC.
 - 6. The singular and plural forms of any word shall be construed interchangeably.
 - 7. “*Any*” shall be construed to include “*all*,” and “*all*” shall be construed to include “*any*.”
 - 8. “*Including*” shall be construed to mean “*including, but not limited to*.”
 - 9. The “*United States*” shall be construed to mean the United States of America, its agencies, departments, and representatives.

INSTRUCTIONS

1. This CID applies to all documents in your possession, custody, or control regardless of their location and regardless of whether such material is held by your current or former employees, including facility-level personnel, mid-level management personnel, upper-level management personnel, directors, officers, in-house IT specialists and technicians, IT specialists and technicians to whom digital services have been out-sourced, consultants, representatives, agents, and any and all other persons acting on your behalf. Information and materials sought by this CID shall also include information and materials within the possession, custody, or control of any of your agents, officers, or employees, or any person acting as your representative or on your behalf.
2. Unless otherwise specified, this CID applies to all documents in your possession, custody, or control from the period **from December 1, 2019 to the date of this CID's issuance**. Documents created prior to December 1, 2019, that have been used or relied on by you since December 1, 2019, or that describe any duties, obligations, or policies that were in effect after December 1, 2019, are within the time frame of this CID.
3. The relevant time period for the information requested by written interrogatories is **from December 1, 2019 to the date of this CID's issuance**. The interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this Demand. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.
4. If you become aware that you possess, have custody or control of additional documents responsive to this CID, you shall promptly produce such additional documents.
5. If you intend to withhold from production any document based upon a claim of legal privilege, work product, or any other protection from production:
 - a. Identify with particularity and in a written log each such document by date, author(s), addressee(s), recipient(s), title, subject matter, purpose, and present custody of each and every questioned document;
 - b. State with particularity the privilege, work product principle, or other legal protection upon which you are relying in claiming each and every questioned document should be withheld from production; and
 - c. State with particularity each and every fact supporting the claim of privilege(s), work product protection, or other legal

protection(s) from production.

6. Identify all responsive documents that have been lost, discarded, destroyed, altered, or spoiled. In so doing, state: (a) the type of document; (b) the date of its creation; (c) the approximate date it was lost, discarded, destroyed, altered, or spoiled; (d) the nature of the spoliation; (e) the cause of the spoliation; (f) whether the spoliation was purposeful, inadvertent, or accidental; and, (g) the identity of each person having knowledge about the document and about its spoliation.
7. All documents provided in response to this CID are to include all marginalia and post-its, as well as any attachments referred to or incorporated by the document. To the extent that documents are found attached to other documents, by means of paper clips, staples or other means of attachment, such documents shall be produced together in the condition in which they are found. All documents should be produced in the manner and format in which they are kept in the usual course of business. If documents are stored electronically, they should be produced in electronic format. If documents are stored in multiple formats, they should be produced in each format in which they are stored.
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9. If no document exists that is responsive to a request, a written statement to that effect shall be provided at the time of production.
10. All hard copy documents shall be scanned and produced in electronic format.

EXHIBIT A – INTERROGATORIES

1. Identify all of Your current and former owners, shareholders, or unit-holders, including:
 - a. for each individual owner, shareholder, or unit-holder,
 - i. their name,
 - ii. their date of birth,
 - iii. their home address,
 - iv. their business address,
 - v. their social security number,
 - vi. the class of their investment, and
 - vii. the dates they held such an interest.
 - b. for each company, corporation, partnership, proprietorship, trust, or other entity-based owner,
 - i. the entity's name,
 - ii. the entity's address,
 - iii. the class of the entity's investment, and
 - iv. all individuals You know to have a direct or indirect interest in such entity.
2. Identify all addresses where You conduct business and, for each location, summarize the nature of the business conducted there.
3. Identify Your directors and corporate officers, both former and current, including for each individual:
 - a. their name,
 - b. their date of birth,
 - c. their home address,
 - d. their business address,
 - e. their social security number,
 - f. their title,
 - g. the dates held such title, and
 - h. a description of all powers, authorities, duties, and obligations associated with such title.
4. Identify all of Your current and former employees, contractors, and volunteers.
5. Identify Your current and former corporate parents, subsidiaries, and affiliates, to the extent such entities exist, and provide information sufficient to show the corporate structure of any such entities in relation to You.

6. Identify all investments and capital contributions, including the person or entity that made the investment.
7. Identify any real property in which You have or have had an ownership, leasehold, mortgage, or security interest, including for each such property identify:
 - a. the nature of Your interest,
 - b. the date You acquired such an interest,
 - c. the seller,
 - d. manner of sale,
 - e. the purchase price you paid to acquire such interest,
 - f. the terms of any payments due by or owed to you in connection with Your interest, and
 - g. if You have sold or otherwise disposed of the interest, the date and terms under which You sold or disposed of the interest.
8. Identify by name, address, and telephone number each and every domestic and foreign bank and/or financial institution in which You have or had an account, and provide the account number, type of account, and account balance.

EXHIBIT B - DOCUMENTS TO BE PRODUCED

1. Your certificate of incorporation, bylaws, rules, regulations, procedures, and all amendments thereto.
2. Your current organizational chart.
3. A copy of each unique past organizational chart.
4. One copy of each annual or other periodic report of Your company, separately for your company and each of its divisions or subsidiaries.
5. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each board of directors of Your company and of each committee or subgroup of each board.
6. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each committee, group or subgroup of management employees of Your company, separately for your company and each of its divisions or subsidiaries.
7. All records of purchase, sale, mortgage, or lease of an interest in the properties identified in response to Interrogatory 7.
8. All power of attorney documents in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
9. All documents and communications related to any power of attorney agreements in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
10. All employment, contractor, and volunteer agreements.
11. All communications with House of Prayer Bible Seminary, House of Prayer Christian Churches of America, Inc., including their officers, members, employees, agents, and volunteers.

CERTIFICATE OF COMPLIANCE

I have responsibility for producing the documents requested in Civil Investigative Demand No. CID 2023-015. I hereby certify that all the materials required by that Civil Investigative Demand that are in the possession, custody, or control of the entities to whom the Demand is directed have been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

CERTIFICATE OF COMPLIANCE

I have responsibility for answering the written interrogatories requested in Civil Investigative Demand No. CID 2023-015. I hereby certify that all information required by that Civil Investigative Demand that is in the possession, custody, control, or knowledge of the entities to whom the Demand is directed has been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

PROOF OF SERVICE

I, _____, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on _____, I served an original executed copy of Civil Investigative Demand No. 2023-015 by

(CHECK ONE)

- ☐ Personal Delivery; or
- ☐ Certified/Registered Mail

to the following:

NAME Deerwood Point LLC
 5501 Abercorn Street
 Unit 5-201
 Savannah, GA 31405

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

DATE

SIGNATURE

PROOF OF SERVICE

I, Charles D. Sikes, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on 10/25/2023, I served an original executed copy of Civil Investigative Demand No. 2023-015 by

(CHECK ONE)

☐ Personal Delivery; or

☒ Certified/Registered Mail | 7021 2720 0003 1537 2183

to the following:

NAME Deerwood Point LLC
 5501 Abercorn Street
 Unit 5-201
 Savannah, GA 31405



I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

10/25/2023

DATE

Charles D. Sikes

SIGNATURE

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>	<p>A. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p>																	
<p>1. Article Addressed to:</p> <p>Deerwood Point, LLC 5501 Abercorn Street Unit 5-201 Savannah, GA 31405</p>  <p>9590 9402 6845 1074 0532 25</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																	
<p>2. Article Number (Transfer from service label)</p> <p>7021 2720 0003 1539 2183</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>		<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																	
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PS Form 3811, July 2020 PSN 7530-02-000-9053		Domestic Return Receipt																

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Latest Update

Your item was delivered to an individual at the address at 2:14 pm on October 27, 2023 in SAVANNAH, GA 31405.

Get More Out of USPS Tracking:

USPS Tracking Plus[®]

Delivered
Delivered, Left with Individual
SAVANNAH, GA 31405
October 27, 2023, 2:14 pm

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Text & Email Updates



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Product Information



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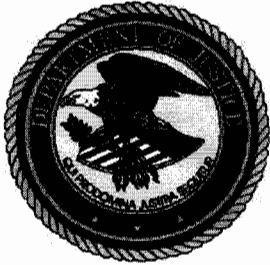
Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs



UNITED STATES OF AMERICA
U.S. DEPARTMENT OF JUSTICE

United States Attorney's Office
Southern District of Georgia

CIVIL INVESTIGATIVE DEMAND
Interrogatories and Documents

TO: Honey Park LLC
2625 Piedmont Rd, NE
No. 56-412
Atlanta, GA 30324

CID No. 2023-016

This Civil Investigative Demand ("CID") is issued pursuant to the False Claims Act, 31 U.S.C. §§ 3729–3733, in the course of a False Claims Act investigation to determine whether there is or has been a violation of 31 U.S.C. § 3729, *et. seq.* This False Claims Act investigation concerns allegations that House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary, their employees, contractors, and agents, as well as other individuals or entities, violated or conspired to violate the False Claims Act by obtaining funds from the Department of Veterans Affairs for education and housing benefit programs to which they were not entitled. The general purpose of this CID is to discover information relating to these allegations and to determine whether House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary and their employees, contractors, and agents have violated the False Claims Act.

This is the original CID; no copies have been served on other parties.

You are hereby commanded to answer in writing the written interrogatories attached hereto as "Exhibit A" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), and submit such answers to Assistant United States Attorney Bradford C. Patrick at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. The written interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this CID. If you object to any

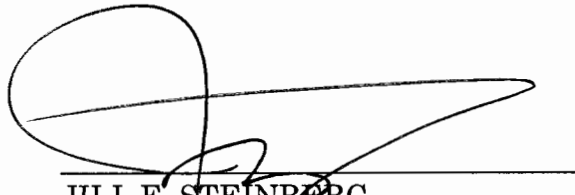
interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.

You are further commanded to produce a copy of requested documentation identified hereto as "Exhibit B" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), to Assistant United States Attorney Bradford C. Patrick, at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. If you object to any document request, state your objection and set forth with particularity the reasons why the document was not produced on the certificate.

The following, as well as their supervisors, will serve as False Claims Act investigators and custodians to whom such material shall be made available: Assistant United States Attorney Bradford C. Patrick.

A response to this CID, including execution and return of the attached certification, is necessary to the conduct of the investigation. Failure to comply with any of the requirements of this CID will render you liable to proceedings in the United States District Court.

Issued under the authority of 31 U.S.C. § 3733 on this 19th day of October, 2023.

A handwritten signature in dark ink, appearing to read 'Jill E. Steinberg', is written over a horizontal line.

JILL E. STEINBERG
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF GEORGIA

DEFINITIONS

1. *Document* means any and all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations whether preserved in *hard-paper form* or stored in *digital form* in any medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form, and includes, but is not limited to, any and all originals, copies and reproductions (except for materials that are *de-duplicated* under the terms of this CID), *archived data*, and *backup data* of all records, papers, tables, charts, appointment calendars, schedules, journals, notes, memoranda, logs, manuals, reports, minutes, notices, bulletins, financial statements, balance sheets, ledgers, contracts, agreements, promissory notes, security agreements or other negotiable instruments, telegrams, facsimiles, telexes, wire transfers, films, microfilms, photographs, video files, slides, audio recordings, transcriptions, phone records, *communications* (including, but not limited to electronic communications), voice mail, computer files, or any other information or data compilations stored in *databases* or accessible through computer or other information retrieval systems, *e.g.*, Portable Digital Assistants ("PDAs"), together with instructions and all other materials necessary to use or interpret such data compilations, and other like or similar tangible things, regardless of the means of their preparation and use.
2. *Communication* means any transmission or exchange of information between two or more persons orally or in writing, whether by chance or design, and includes, without limitation, any conversation or discussion, whether by face-to-face encounter, by regular mail or courier, by telephone, or by other means of electronic communication, whether transmitted in interstate or intrastate commerce. *Communication* includes, but is not limited to:
 - a. *Email* (a/k/a *electronic mail* or *e-mail*): an electronic means for communicating information under specified conditions, generally in the form of text messages, through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.
 - b. *Text Messages* (a/k/a *texts* or *iMessages*): a form of electronic communication involving immediate communication between two or more users through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.
 - c. *Instant Messages* (a/k/a *IM*): a form of electronic communication involving immediate communication between two or more online users; *stored IM* communications are messages that are purposely stored on a client computer.

- d. *Header information*: distribution information associated with email such as *Sender, Recipient, Subject, Date and Time, cc: (carbon copy), bcc: (blind carbon copy)*.
 - e. *Parent email, parent items, and child files*: *parent email* refers to the content and substance of an electronic communication, including *header information*; *parent items* refers to the content and substance of items such as calendars, tasks, notes, etc.; *child files* refers to files attached to *parent files* or *parent items*.
 - f. *Social Media* means electronic communication by and between correspondents connected together using media such as blogs (e.g., Twitter), content communities (e.g., YouTube), or social networks (e.g., Facebook).
- 3. “And,” “or,” and “and/or” shall be construed either disjunctively or conjunctively so as to bring within the scope of this CID for documents any material which might otherwise be construed as outside the scope of this CID.
 - 4. “*Relating to*” or “*relate to*” or “*discussing*” means consisting of, referring to, reflecting, supporting, evidencing, discussing, describing, embodying, memorializing, containing, constituting, including, identifying, stating, studying, reporting, commenting, analyzing, setting forth, considering, recommending, concerning, pertaining or being relevant to, in whole or in part, prepared in connection with, used in preparation for, or being in any way legally, logically, or factually connected to the matter discussed.
 - 5. “*You*” or “*your*” means Honey Park LLC.
 - 6. The singular and plural forms of any word shall be construed interchangeably.
 - 7. “*Any*” shall be construed to include “*all*,” and “*all*” shall be construed to include “*any*.”
 - 8. “*Including*” shall be construed to mean “*including, but not limited to*.”
 - 9. The “*United States*” shall be construed to mean the United States of America, its agencies, departments, and representatives.

INSTRUCTIONS

1. This CID applies to all documents in your possession, custody, or control regardless of their location and regardless of whether such material is held by your current or former employees, including facility-level personnel, mid-level management personnel, upper-level management personnel, directors, officers, in-house IT specialists and technicians, IT specialists and technicians to whom digital services have been out-sourced, consultants, representatives, agents, and any and all other persons acting on your behalf. Information and materials sought by this CID shall also include information and materials within the possession, custody, or control of any of your agents, officers, or employees, or any person acting as your representative or on your behalf.
2. Unless otherwise specified, this CID applies to all documents in your possession, custody, or control from the period **from December 1, 2019 to the date of this CID's issuance**. Documents created prior to December 1, 2019, that have been used or relied on by you since December 1, 2019, or that describe any duties, obligations, or policies that were in effect after December 1, 2019, are within the time frame of this CID.
3. The relevant time period for the information requested by written interrogatories is **from December 1, 2019 to the date of this CID's issuance**. The interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this Demand. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.
4. If you become aware that you possess, have custody or control of additional documents responsive to this CID, you shall promptly produce such additional documents.
5. If you intend to withhold from production any document based upon a claim of legal privilege, work product, or any other protection from production:
 - a. Identify with particularity and in a written log each such document by date, author(s), addressee(s), recipient(s), title, subject matter, purpose, and present custody of each and every questioned document;
 - b. State with particularity the privilege, work product principle, or other legal protection upon which you are relying in claiming each and every questioned document should be withheld from production; and
 - c. State with particularity each and every fact supporting the claim of privilege(s), work product protection, or other legal

protection(s) from production.

6. Identify all responsive documents that have been lost, discarded, destroyed, altered, or spoiled. In so doing, state: (a) the type of document; (b) the date of its creation; (c) the approximate date it was lost, discarded, destroyed, altered, or spoiled; (d) the nature of the spoliation; (e) the cause of the spoliation; (f) whether the spoliation was purposeful, inadvertent, or accidental; and, (g) the identity of each person having knowledge about the document and about its spoliation.
7. All documents provided in response to this CID are to include all marginalia and post-its, as well as any attachments referred to or incorporated by the document. To the extent that documents are found attached to other documents, by means of paper clips, staples or other means of attachment, such documents shall be produced together in the condition in which they are found. All documents should be produced in the manner and format in which they are kept in the usual course of business. If documents are stored electronically, they should be produced in electronic format. If documents are stored in multiple formats, they should be produced in each format in which they are stored.
8. All documents provided in response to this CID are to be organized in such a manner that each document responsive to a particular request is grouped together and identified as being responsive to that request.
9. If no document exists that is responsive to a request, a written statement to that effect shall be provided at the time of production.
10. All hard copy documents shall be scanned and produced in electronic format.

EXHIBIT A – INTERROGATORIES

1. Identify all of Your current and former owners, shareholders, or unit-holders, including:
 - a. for each individual owner, shareholder, or unit-holder,
 - i. their name,
 - ii. their date of birth,
 - iii. their home address,
 - iv. their business address,
 - v. their social security number,
 - vi. the class of their investment, and
 - vii. the dates they held such an interest.
 - b. for each company, corporation, partnership, proprietorship, trust, or other entity-based owner,
 - i. the entity's name,
 - ii. the entity's address,
 - iii. the class of the entity's investment, and
 - iv. all individuals You know to have a direct or indirect interest in such entity.
2. Identify all addresses where You conduct business and, for each location, summarize the nature of the business conducted there.
3. Identify Your directors and corporate officers, both former and current, including for each individual:
 - a. their name,
 - b. their date of birth,
 - c. their home address,
 - d. their business address,
 - e. their social security number,
 - f. their title,
 - g. the dates held such title, and
 - h. a description of all powers, authorities, duties, and obligations associated with such title.
4. Identify all of Your current and former employees, contractors, and volunteers.
5. Identify Your current and former corporate parents, subsidiaries, and affiliates, to the extent such entities exist, and provide information sufficient to show the corporate structure of any such entities in relation to You.

6. Identify all investments and capital contributions, including the person or entity that made the investment.
7. Identify any real property in which You have or have had an ownership, leasehold, mortgage, or security interest, including for each such property identify:
 - a. the nature of Your interest,
 - b. the date You acquired such an interest,
 - c. the seller,
 - d. manner of sale,
 - e. the purchase price you paid to acquire such interest,
 - f. the terms of any payments due by or owed to you in connection with Your interest, and
 - g. if You have sold or otherwise disposed of the interest, the date and terms under which You sold or disposed of the interest.
8. Identify by name, address, and telephone number each and every domestic and foreign bank and/or financial institution in which You have or had an account, and provide the account number, type of account, and account balance.

EXHIBIT B - DOCUMENTS TO BE PRODUCED

1. Your certificate of incorporation, bylaws, rules, regulations, procedures, and all amendments thereto.
2. Your current organizational chart.
3. A copy of each unique past organizational chart.
4. One copy of each annual or other periodic report of Your company, separately for your company and each of its divisions or subsidiaries.
5. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each board of directors of Your company and of each committee or subgroup of each board.
6. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each committee, group or subgroup of management employees of Your company, separately for your company and each of its divisions or subsidiaries.
7. All records of purchase, sale, mortgage, or lease of an interest in the properties identified in response to Interrogatory 7.
8. All power of attorney documents in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
9. All documents and communications related to any power of attorney agreements in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
10. All employment, contractor, and volunteer agreements.
11. All communications with House of Prayer Bible Seminary, House of Prayer Christian Churches of America, Inc., including their officers, members, employees, agents, and volunteers.

CERTIFICATE OF COMPLIANCE

I have responsibility for producing the documents requested in Civil Investigative Demand No. CID 2023-016. I hereby certify that all the materials required by that Civil Investigative Demand that are in the possession, custody, or control of the entities to whom the Demand is directed have been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

CERTIFICATE OF COMPLIANCE

I have responsibility for answering the written interrogatories requested in Civil Investigative Demand No. CID 2023-016. I hereby certify that all information required by that Civil Investigative Demand that is in the possession, custody, control, or knowledge of the entities to whom the Demand is directed has been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

PROOF OF SERVICE

I, _____, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on _____, I served an original executed copy of Civil Investigative Demand No. 2023-016 by

(CHECK ONE)

- ☐ Personal Delivery; or
- ☐ Certified/Registered Mail

to the following:

NAME Honey Park LLC
 2625 Piedmont Rd, NE
 No. 56-412
 Atlanta, GA 30324

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

DATE

SIGNATURE

PROOF OF SERVICE

I, Charles D. Sikes, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on 10/25/2023, I served an original executed copy of Civil Investigative Demand No. 2023-016 by

(CHECK ONE)

☐ Personal Delivery; or

☒ Certified/Registered Mail / 7021 2720 0003 1539 2190

to the following:

NAME Honey Park LLC
 2625 Piedmont Rd, NE
 No. 56-412
 Atlanta, GA 30324

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

10/25/2023
DATE

Charles D. Sikes
SIGNATURE



FAQs >

Tracking Number:

Remove X

70212720000315392190

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Latest Update

Your item has been delivered to an agent for final delivery in ATLANTA, GA 30324 on October 28, 2023 at 12:13 pm.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered to Agent
Delivered to Agent for Final Delivery
ATLANTA, GA 30324
October 28, 2023, 12:13 pm

[See All Tracking History](#)

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

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Contact USPS Tracking support for further assistance.

FAQs



UNITED STATES OF AMERICA
U.S. DEPARTMENT OF JUSTICE

United States Attorney's Office
Southern District of Georgia

CIVIL INVESTIGATIVE DEMAND
Interrogatories and Documents

TO: Mariah Marie LLC
5710 Ogeechee Rd
No. 200-197
Savannah, GA 31405

CID No. 2023-019

This Civil Investigative Demand ("CID") is issued pursuant to the False Claims Act, 31 U.S.C. §§ 3729–3733, in the course of a False Claims Act investigation to determine whether there is or has been a violation of 31 U.S.C. § 3729, *et. seq.* This False Claims Act investigation concerns allegations that House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary, their employees, contractors, and agents, as well as other individuals or entities, violated or conspired to violate the False Claims Act by obtaining funds from the Department of Veterans Affairs for education and housing benefit programs to which they were not entitled. The general purpose of this CID is to discover information relating to these allegations and to determine whether House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary and their employees, contractors, and agents have violated the False Claims Act.

This is the original CID; no copies have been served on other parties.

You are hereby commanded to answer in writing the written interrogatories attached hereto as "Exhibit A" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), and submit such answers to Assistant United States Attorney Bradford C. Patrick at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. The written interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this CID. If you object to any


interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.

You are further commanded to produce a copy of requested documentation identified hereto as "Exhibit B" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), to Assistant United States Attorney Bradford C. Patrick, at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. If you object to any document request, state your objection and set forth with particularity the reasons why the document was not produced on the certificate.

The following, as well as their supervisors, will serve as False Claims Act investigators and custodians to whom such material shall be made available: Assistant United States Attorney Bradford C. Patrick.

A response to this CID, including execution and return of the attached certification, is necessary to the conduct of the investigation. Failure to comply with any of the requirements of this CID will render you liable to proceedings in the United States District Court.

Issued under the authority of 31 U.S.C. § 3733 on this 19th day of October, 2023.



JILL E. STEINBERG
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF GEORGIA

DEFINITIONS

1. *Document* means any and all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations whether preserved in *hard-paper form* or stored in *digital form* in any medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form, and includes, but is not limited to, any and all originals, copies and reproductions (except for materials that are *de-duplicated* under the terms of this CID), *archived data*, and *backup data* of all records, papers, tables, charts, appointment calendars, schedules, journals, notes, memoranda, logs, manuals, reports, minutes, notices, bulletins, financial statements, balance sheets, ledgers, contracts, agreements, promissory notes, security agreements or other negotiable instruments, telegrams, facsimiles, telexes, wire transfers, films, microfilms, photographs, video files, slides, audio recordings, transcriptions, phone records, *communications* (including, but not limited to electronic communications), voice mail, computer files, or any other information or data compilations stored in *databases* or accessible through computer or other information retrieval systems, *e.g.*, Portable Digital Assistants (“PDAs”), together with instructions and all other materials necessary to use or interpret such data compilations, and other like or similar tangible things, regardless of the means of their preparation and use.

2. *Communication* means any transmission or exchange of information between two or more persons orally or in writing, whether by chance or design, and includes, without limitation, any conversation or discussion, whether by face-to-face encounter, by regular mail or courier, by telephone, or by other means of electronic communication, whether transmitted in interstate or intrastate commerce. *Communication* includes, but is not limited to:
 - a. *Email* (a/k/a *electronic mail* or *e-mail*): an electronic means for communicating information under specified conditions, generally in the form of text messages, through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.

 - b. *Text Messages* (a/k/a *texts* or *iMessages*): a form of electronic communication involving immediate communication between two or more users through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.

 - c. *Instant Messages* (a/k/a *IM*): a form of electronic communication involving immediate communication between two or more online users; *stored IM* communications are messages that are purposely stored on a client computer.

- d. *Header information*: distribution information associated with email such as *Sender, Recipient, Subject, Date and Time, cc: (carbon copy), bcc: (blind carbon copy)*.
 - e. *Parent email, parent items, and child files*: *parent email* refers to the content and substance of an electronic communication, including *header information*; *parent items* refers to the content and substance of items such as calendars, tasks, notes, etc.; *child files* refers to files attached to *parent files* or *parent items*.
 - f. *Social Media* means electronic communication by and between correspondents connected together using media such as blogs (e.g., Twitter), content communities (e.g., YouTube), or social networks (e.g., Facebook).
- 3. “*And*,” “*or*,” and “*and/or*” shall be construed either disjunctively or conjunctively so as to bring within the scope of this CID for documents any material which might otherwise be construed as outside the scope of this CID.
 - 4. “*Relating to*” or “*relate to*” or “*discussing*” means consisting of, referring to, reflecting, supporting, evidencing, discussing, describing, embodying, memorializing, containing, constituting, including, identifying, stating, studying, reporting, commenting, analyzing, setting forth, considering, recommending, concerning, pertaining or being relevant to, in whole or in part, prepared in connection with, used in preparation for, or being in any way legally, logically, or factually connected to the matter discussed.
 - 5. “*You*” or “*your*” means Mariah Marie LLC.
 - 6. The singular and plural forms of any word shall be construed interchangeably.
 - 7. “*Any*” shall be construed to include “*all*,” and “*all*” shall be construed to include “*any*.”
 - 8. “*Including*” shall be construed to mean “*including, but not limited to*.”
 - 9. The “*United States*” shall be construed to mean the United States of America, its agencies, departments, and representatives.

INSTRUCTIONS

1. This CID applies to all documents in your possession, custody, or control regardless of their location and regardless of whether such material is held by your current or former employees, including facility-level personnel, mid-level management personnel, upper-level management personnel, directors, officers, in-house IT specialists and technicians, IT specialists and technicians to whom digital services have been out-sourced, consultants, representatives, agents, and any and all other persons acting on your behalf. Information and materials sought by this CID shall also include information and materials within the possession, custody, or control of any of your agents, officers, or employees, or any person acting as your representative or on your behalf.
2. Unless otherwise specified, this CID applies to all documents in your possession, custody, or control from the period **from December 1, 2019 to the date of this CID's issuance**. Documents created prior to December 1, 2019, that have been used or relied on by you since December 1, 2019, or that describe any duties, obligations, or policies that were in effect after December 1, 2019, are within the time frame of this CID.
3. The relevant time period for the information requested by written interrogatories is **from December 1, 2019 to the date of this CID's issuance**. The interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this Demand. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.
4. If you become aware that you possess, have custody or control of additional documents responsive to this CID, you shall promptly produce such additional documents.
5. If you intend to withhold from production any document based upon a claim of legal privilege, work product, or any other protection from production:
 - a. Identify with particularity and in a written log each such document by date, author(s), addressee(s), recipient(s), title, subject matter, purpose, and present custody of each and every questioned document;
 - b. State with particularity the privilege, work product principle, or other legal protection upon which you are relying in claiming each and every questioned document should be withheld from production; and
 - c. State with particularity each and every fact supporting the claim of privilege(s), work product protection, or other legal

protection(s) from production.

6. Identify all responsive documents that have been lost, discarded, destroyed, altered, or spoiled. In so doing, state: (a) the type of document; (b) the date of its creation; (c) the approximate date it was lost, discarded, destroyed, altered, or spoiled; (d) the nature of the spoliation; (e) the cause of the spoliation; (f) whether the spoliation was purposeful, inadvertent, or accidental; and, (g) the identity of each person having knowledge about the document and about its spoliation.
7. All documents provided in response to this CID are to include all marginalia and post-its, as well as any attachments referred to or incorporated by the document. To the extent that documents are found attached to other documents, by means of paper clips, staples or other means of attachment, such documents shall be produced together in the condition in which they are found. All documents should be produced in the manner and format in which they are kept in the usual course of business. If documents are stored electronically, they should be produced in electronic format. If documents are stored in multiple formats, they should be produced in each format in which they are stored.
8. All documents provided in response to this CID are to be organized in such a manner that each document responsive to a particular request is grouped together and identified as being responsive to that request.
9. If no document exists that is responsive to a request, a written statement to that effect shall be provided at the time of production.
10. All hard copy documents shall be scanned and produced in electronic format.

EXHIBIT A – INTERROGATORIES

1. Identify all of Your current and former owners, shareholders, or unit-holders, including:
 - a. for each individual owner, shareholder, or unit-holder,
 - i. their name,
 - ii. their date of birth,
 - iii. their home address,
 - iv. their business address,
 - v. their social security number,
 - vi. the class of their investment, and
 - vii. the dates they held such an interest.
 - b. for each company, corporation, partnership, proprietorship, trust, or other entity-based owner,
 - i. the entity's name,
 - ii. the entity's address,
 - iii. the class of the entity's investment, and
 - iv. all individuals You know to have a direct or indirect interest in such entity.
2. Identify all addresses where You conduct business and, for each location, summarize the nature of the business conducted there.
3. Identify Your directors and corporate officers, both former and current, including for each individual:
 - a. their name,
 - b. their date of birth,
 - c. their home address,
 - d. their business address,
 - e. their social security number,
 - f. their title,
 - g. the dates held such title, and
 - h. a description of all powers, authorities, duties, and obligations associated with such title.
4. Identify all of Your current and former employees, contractors, and volunteers.
5. Identify Your current and former corporate parents, subsidiaries, and affiliates, to the extent such entities exist, and provide information sufficient to show the corporate structure of any such entities in relation to You.

6. Identify all investments and capital contributions, including the person or entity that made the investment.
7. Identify any real property in which You have or have had an ownership, leasehold, mortgage, or security interest, including for each such property identify:
 - a. the nature of Your interest,
 - b. the date You acquired such an interest,
 - c. the seller,
 - d. manner of sale,
 - e. the purchase price you paid to acquire such interest,
 - f. the terms of any payments due by or owed to you in connection with Your interest, and
 - g. if You have sold or otherwise disposed of the interest, the date and terms under which You sold or disposed of the interest.
8. Identify by name, address, and telephone number each and every domestic and foreign bank and/or financial institution in which You have or had an account, and provide the account number, type of account, and account balance.

EXHIBIT B - DOCUMENTS TO BE PRODUCED

1. Your certificate of incorporation, bylaws, rules, regulations, procedures, and all amendments thereto.
2. Your current organizational chart.
3. A copy of each unique past organizational chart.
4. One copy of each annual or other periodic report of Your company, separately for your company and each of its divisions or subsidiaries.
5. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each board of directors of Your company and of each committee or subgroup of each board.
6. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each committee, group or subgroup of management employees of Your company, separately for your company and each of its divisions or subsidiaries.
7. All records of purchase, sale, mortgage, or lease of an interest in the properties identified in response to Interrogatory 7.
8. All power of attorney documents in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
9. All documents and communications related to any power of attorney agreements in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
10. All employment, contractor, and volunteer agreements.
11. All communications with House of Prayer Bible Seminary, House of Prayer Christian Churches of America, Inc., including their officers, members, employees, agents, and volunteers.

CERTIFICATE OF COMPLIANCE

I have responsibility for producing the documents requested in Civil Investigative Demand No. CID 2023-019. I hereby certify that all the materials required by that Civil Investigative Demand that are in the possession, custody, or control of the entities to whom the Demand is directed have been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

CERTIFICATE OF COMPLIANCE

I have responsibility for answering the written interrogatories requested in Civil Investigative Demand No. CID 2023-019. I hereby certify that all information required by that Civil Investigative Demand that is in the possession, custody, control, or knowledge of the entities to whom the Demand is directed has been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

PROOF OF SERVICE

I, Hunter Hinton, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on 11/15/23, I served an executed copy of Civil Investigative Demand No. 2023-019 by

(CHECK ONE)

- ☒ Personal Delivery; or
- ☐ Certified/Registered Mail

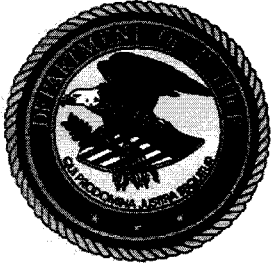
to the following:

NAME Mariah Marie LLC
 c/o Registered Agent Solutions, Inc.
 900 Old Roswell Lakes Pkwy.
 Suite 310
 Roswell, GA 30076

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

11/27/23
DATE


SIGNATURE



UNITED STATES OF AMERICA
U.S. DEPARTMENT OF JUSTICE

United States Attorney's Office
Southern District of Georgia

CIVIL INVESTIGATIVE DEMAND
Interrogatories and Documents

TO: Union G L Park LLC
1055 Howell Mill Road
8th Floor, No. 114
Atlanta, GA 30318

CID No. 2023-022

This Civil Investigative Demand ("CID") is issued pursuant to the False Claims Act, 31 U.S.C. §§ 3729–3733, in the course of a False Claims Act investigation to determine whether there is or has been a violation of 31 U.S.C. § 3729, *et. seq.* This False Claims Act investigation concerns allegations that House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary, their employees, contractors, and agents, as well as other individuals or entities, violated or conspired to violate the False Claims Act by obtaining funds from the Department of Veterans Affairs for education and housing benefit programs to which they were not entitled. The general purpose of this CID is to discover information relating to these allegations and to determine whether House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary and their employees, contractors, and agents have violated the False Claims Act.

This is the original CID; no copies have been served on other parties.

You are hereby commanded to answer in writing the written interrogatories attached hereto as "Exhibit A" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), and submit such answers to Assistant United States Attorney Bradford C. Patrick at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. The written interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this CID. If you object to any


interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.

You are further commanded to produce a copy of requested documentation identified hereto as "Exhibit B" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), to Assistant United States Attorney Bradford C. Patrick, at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. If you object to any document request, state your objection and set forth with particularity the reasons why the document was not produced on the certificate.

The following, as well as their supervisors, will serve as False Claims Act investigators and custodians to whom such material shall be made available: Assistant United States Attorney Bradford C. Patrick.

A response to this CID, including execution and return of the attached certification, is necessary to the conduct of the investigation. Failure to comply with any of the requirements of this CID will render you liable to proceedings in the United States District Court.

Issued under the authority of 31 U.S.C. § 3733 on this 19th day of October, 2023.



JILL E. STEINBERG
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF GEORGIA

DEFINITIONS

1. *Document* means any and all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations whether preserved in *hard-paper form* or stored in *digital form* in any medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form, and includes, but is not limited to, any and all originals, copies and reproductions (except for materials that are *de-duplicated* under the terms of this CID), *archived data*, and *backup data* of all records, papers, tables, charts, appointment calendars, schedules, journals, notes, memoranda, logs, manuals, reports, minutes, notices, bulletins, financial statements, balance sheets, ledgers, contracts, agreements, promissory notes, security agreements or other negotiable instruments, telegrams, facsimiles, telexes, wire transfers, films, microfilms, photographs, video files, slides, audio recordings, transcriptions, phone records, *communications* (including, but not limited to electronic communications), voice mail, computer files, or any other information or data compilations stored in *databases* or accessible through computer or other information retrieval systems, *e.g.*, Portable Digital Assistants (“PDAs”), together with instructions and all other materials necessary to use or interpret such data compilations, and other like or similar tangible things, regardless of the means of their preparation and use.
2. *Communication* means any transmission or exchange of information between two or more persons orally or in writing, whether by chance or design, and includes, without limitation, any conversation or discussion, whether by face-to-face encounter, by regular mail or courier, by telephone, or by other means of electronic communication, whether transmitted in interstate or intrastate commerce. *Communication* includes, but is not limited to:
 - a. *Email* (a/k/a *electronic mail* or *e-mail*): an electronic means for communicating information under specified conditions, generally in the form of text messages, through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.
 - b. *Text Messages* (a/k/a *texts* or *iMessages*): a form of electronic communication involving immediate communication between two or more users through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.
 - c. *Instant Messages* (a/k/a *IM*): a form of electronic communication involving immediate communication between two or more online users; *stored IM* communications are messages that are purposely stored on a client computer.

- d. *Header information*: distribution information associated with email such as *Sender, Recipient, Subject, Date and Time, cc: (carbon copy), bcc: (blind carbon copy)*.
 - e. *Parent email, parent items, and child files*: *parent email* refers to the content and substance of an electronic communication, including *header information*; *parent items* refers to the content and substance of items such as calendars, tasks, notes, etc.; *child files* refers to files attached to *parent files or parent items*.
 - f. *Social Media* means electronic communication by and between correspondents connected together using media such as blogs (e.g., Twitter), content communities (e.g., YouTube), or social networks (e.g., Facebook).
- 3. “And,” “or,” and “and/or” shall be construed either disjunctively or conjunctively so as to bring within the scope of this CID for documents any material which might otherwise be construed as outside the scope of this CID.
 - 4. “Relating to” or “relate to” or “discussing” means consisting of, referring to, reflecting, supporting, evidencing, discussing, describing, embodying, memorializing, containing, constituting, including, identifying, stating, studying, reporting, commenting, analyzing, setting forth, considering, recommending, concerning, pertaining or being relevant to, in whole or in part, prepared in connection with, used in preparation for, or being in any way legally, logically, or factually connected to the matter discussed.
 - 5. “You” or “your” means Union G L Park LLC.
 - 6. The singular and plural forms of any word shall be construed interchangeably.
 - 7. “Any” shall be construed to include “all,” and “all” shall be construed to include “any.”
 - 8. “Including” shall be construed to mean “including, but not limited to.”
 - 9. The “United States” shall be construed to mean the United States of America, its agencies, departments, and representatives.

INSTRUCTIONS

1. This CID applies to all documents in your possession, custody, or control regardless of their location and regardless of whether such material is held by your current or former employees, including facility-level personnel, mid-level management personnel, upper-level management personnel, directors, officers, in-house IT specialists and technicians, IT specialists and technicians to whom digital services have been out-sourced, consultants, representatives, agents, and any and all other persons acting on your behalf. Information and materials sought by this CID shall also include information and materials within the possession, custody, or control of any of your agents, officers, or employees, or any person acting as your representative or on your behalf.
2. Unless otherwise specified, this CID applies to all documents in your possession, custody, or control from the period **from December 1, 2019 to the date of this CID's issuance**. Documents created prior to December 1, 2019, that have been used or relied on by you since December 1, 2019, or that describe any duties, obligations, or policies that were in effect after December 1, 2019, are within the time frame of this CID.
3. The relevant time period for the information requested by written interrogatories is **from December 1, 2019 to the date of this CID's issuance**. The interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this Demand. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.
4. If you become aware that you possess, have custody or control of additional documents responsive to this CID, you shall promptly produce such additional documents.
5. If you intend to withhold from production any document based upon a claim of legal privilege, work product, or any other protection from production:
 - a. Identify with particularity and in a written log each such document by date, author(s), addressee(s), recipient(s), title, subject matter, purpose, and present custody of each and every questioned document;
 - b. State with particularity the privilege, work product principle, or other legal protection upon which you are relying in claiming each and every questioned document should be withheld from production; and
 - c. State with particularity each and every fact supporting the claim of privilege(s), work product protection, or other legal

protection(s) from production.

6. Identify all responsive documents that have been lost, discarded, destroyed, altered, or spoiled. In so doing, state: (a) the type of document; (b) the date of its creation; (c) the approximate date it was lost, discarded, destroyed, altered, or spoiled; (d) the nature of the spoliation; (e) the cause of the spoliation; (f) whether the spoliation was purposeful, inadvertent, or accidental; and, (g) the identity of each person having knowledge about the document and about its spoliation.
7. All documents provided in response to this CID are to include all marginalia and post-its, as well as any attachments referred to or incorporated by the document. To the extent that documents are found attached to other documents, by means of paper clips, staples or other means of attachment, such documents shall be produced together in the condition in which they are found. All documents should be produced in the manner and format in which they are kept in the usual course of business. If documents are stored electronically, they should be produced in electronic format. If documents are stored in multiple formats, they should be produced in each format in which they are stored.
8. All documents provided in response to this CID are to be organized in such a manner that each document responsive to a particular request is grouped together and identified as being responsive to that request.
9. If no document exists that is responsive to a request, a written statement to that effect shall be provided at the time of production.
10. All hard copy documents shall be scanned and produced in electronic format.

EXHIBIT A – INTERROGATORIES

1. Identify all of Your current and former owners, shareholders, or unit-holders, including:
 - a. for each individual owner, shareholder, or unit-holder,
 - i. their name,
 - ii. their date of birth,
 - iii. their home address,
 - iv. their business address,
 - v. their social security number,
 - vi. the class of their investment, and
 - vii. the dates they held such an interest.
 - b. for each company, corporation, partnership, proprietorship, trust, or other entity-based owner,
 - i. the entity's name,
 - ii. the entity's address,
 - iii. the class of the entity's investment, and
 - iv. all individuals You know to have a direct or indirect interest in such entity.
2. Identify all addresses where You conduct business and, for each location, summarize the nature of the business conducted there.
3. Identify Your directors and corporate officers, both former and current, including for each individual:
 - a. their name,
 - b. their date of birth,
 - c. their home address,
 - d. their business address,
 - e. their social security number,
 - f. their title,
 - g. the dates held such title, and
 - h. a description of all powers, authorities, duties, and obligations associated with such title.
4. Identify all of Your current and former employees, contractors, and volunteers.
5. Identify Your current and former corporate parents, subsidiaries, and affiliates, to the extent such entities exist, and provide information sufficient to show the corporate structure of any such entities in relation to You.

6. Identify all investments and capital contributions, including the person or entity that made the investment.
7. Identify any real property in which You have or have had an ownership, leasehold, mortgage, or security interest, including for each such property identify:
 - a. the nature of Your interest,
 - b. the date You acquired such an interest,
 - c. the seller,
 - d. manner of sale,
 - e. the purchase price you paid to acquire such interest,
 - f. the terms of any payments due by or owed to you in connection with Your interest, and
 - g. if You have sold or otherwise disposed of the interest, the date and terms under which You sold or disposed of the interest.
8. Identify by name, address, and telephone number each and every domestic and foreign bank and/or financial institution in which You have or had an account, and provide the account number, type of account, and account balance.

EXHIBIT B - DOCUMENTS TO BE PRODUCED

1. Your certificate of incorporation, bylaws, rules, regulations, procedures, and all amendments thereto.
2. Your current organizational chart.
3. A copy of each unique past organizational chart.
4. One copy of each annual or other periodic report of Your company, separately for your company and each of its divisions or subsidiaries.
5. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each board of directors of Your company and of each committee or subgroup of each board.
6. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each committee, group or subgroup of management employees of Your company, separately for your company and each of its divisions or subsidiaries.
7. All records of purchase, sale, mortgage, or lease of an interest in the properties identified in response to Interrogatory 7.
8. All power of attorney documents in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
9. All documents and communications related to any power of attorney agreements in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
10. All employment, contractor, and volunteer agreements.
11. All communications with House of Prayer Bible Seminary, House of Prayer Christian Churches of America, Inc., including their officers, members, employees, agents, and volunteers.

CERTIFICATE OF COMPLIANCE

I have responsibility for producing the documents requested in Civil Investigative Demand No. CID 2023-022. I hereby certify that all the materials required by that Civil Investigative Demand that are in the possession, custody, or control of the entities to whom the Demand is directed have been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

CERTIFICATE OF COMPLIANCE

I have responsibility for answering the written interrogatories requested in Civil Investigative Demand No. CID 2023-022. I hereby certify that all information required by that Civil Investigative Demand that is in the possession, custody, control, or knowledge of the entities to whom the Demand is directed has been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

PROOF OF SERVICE

I, _____, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on _____, I served an original executed copy of Civil Investigative Demand No. 2023-022 by

(CHECK ONE)

- ☐ Personal Delivery; or
- ☐ Certified/Registered Mail

to the following:

NAME Union G L Park LLC
 715 Peachtree St. NE
 Suite 100 & 200, No. 606
 Atlanta, GA 30308

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

DATE

SIGNATURE

PROOF OF SERVICE

I, Charles D. Sikes, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on 10/25/2023, I served an original executed copy of Civil Investigative Demand No. 2023-022 by

(CHECK ONE)

☐ Personal Delivery; or

☒ Certified/Registered Mail 7021 2720 0003 1539 2138


to the following:

NAME Union G L Park LLC
 1055 Howell Mill Road
 8th Floor, No. 114
 Atlanta, GA 30318

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

10/25/2023
DATE

Charles D. Sikes
SIGNATURE

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY																	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/>  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>																	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>Union G L Park, LLC 1055 Howell Mill Road 8th Floor, No. 114 Atlanta, GA 30318</p> </div>		<p>B. Received by (Printed Name) P. SMITH</p> <p>C. Date of Delivery</p>																	
<p>2. Article Number (Transfer from service label)</p> <p>7021 2720 0003 1539 2138</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																	
<p>9590 9402 6845 1074 0532 94</p>		<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>		<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																		
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																		
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<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																			
PS Form 3811, July 2020 PSN 7530-02-000-9053		Domestic Return Receipt																	

USPS Tracking[®]

FAQs >

Tracking Number:

Remove X

70212720000315392138

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was delivered to an individual at the address at 3:01 pm on November 10, 2023 in ATLANTA, GA 30318.

Get More Out of USPS Tracking:

USPS Tracking Plus[®]

Delivered

Delivered, Left with Individual

ATLANTA, GA 30318

November 10, 2023, 3:01 pm

[See All Tracking History](#)

Feedback

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

Text & Email Updates



USPS Tracking Plus[®]



Product Information



See Less ^

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs



UNITED STATES OF AMERICA
U.S. DEPARTMENT OF JUSTICE

United States Attorney's Office
Southern District of Georgia

CIVIL INVESTIGATIVE DEMAND
Interrogatories and Documents

TO: Governors Management LLC
60 Exchange Street, Suite C3 No. 248
Richmond Hill, GA 31324

CID No. 2023-023

This Civil Investigative Demand ("CID") is issued pursuant to the False Claims Act, 31 U.S.C. §§ 3729–3733, in the course of a False Claims Act investigation to determine whether there is or has been a violation of 31 U.S.C. § 3729, *et. seq.* This False Claims Act investigation concerns allegations that House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary, their employees, contractors, and agents, as well as other individuals or entities, violated or conspired to violate the False Claims Act by obtaining funds from the Department of Veterans Affairs for education and housing benefit programs to which they were not entitled. The general purpose of this CID is to discover information relating to these allegations and to determine whether House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary and their employees, contractors, and agents have violated the False Claims Act.

This is the original CID; no copies have been served on other parties.

You are hereby commanded to answer in writing the written interrogatories attached hereto as "Exhibit A" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), and submit such answers to Assistant United States Attorney Bradford C. Patrick at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. The written interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this CID. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.

You are further commanded to produce a copy of requested documentation identified hereto as "Exhibit B" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), to Assistant United States Attorney Bradford C. Patrick, at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. If you object to any document request, state your objection and set forth with particularity the reasons why the document was not produced on the certificate.

The following, as well as their supervisors, will serve as False Claims Act investigators and custodians to whom such material shall be made available: Assistant United States Attorney Bradford C. Patrick.

A response to this CID, including execution and return of the attached certification, is necessary to the conduct of the investigation. Failure to comply with any of the requirements of this CID will render you liable to proceedings in the United States District Court.

Issued under the authority of 31 U.S.C. § 3733 on this 12 day of November, 2023.



JILL E. STEINBERG
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF GEORGIA

DEFINITIONS

1. *Document* means any and all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations whether preserved in *hard-paper form* or stored in *digital form* in any medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form, and includes, but is not limited to, any and all originals, copies and reproductions (except for materials that are *de-duplicated* under the terms of this CID), *archived data*, and *backup data* of all records, papers, tables, charts, appointment calendars, schedules, journals, notes, memoranda, logs, manuals, reports, minutes, notices, bulletins, financial statements, balance sheets, ledgers, contracts, agreements, promissory notes, security agreements or other negotiable instruments, telegrams, facsimiles, telexes, wire transfers, films, microfilms, photographs, video files, slides, audio recordings, transcriptions, phone records, *communications* (including, but not limited to electronic communications), voice mail, computer files, or any other information or data compilations stored in *databases* or accessible through computer or other information retrieval systems, *e.g.*, Portable Digital Assistants ("PDAs"), together with instructions and all other materials necessary to use or interpret such data compilations, and other like or similar tangible things, regardless of the means of their preparation and use.

2. *Communication* means any transmission or exchange of information between two or more persons orally or in writing, whether by chance or design, and includes, without limitation, any conversation or discussion, whether by face-to-face encounter, by regular mail or courier, by telephone, or by other means of electronic communication, whether transmitted in interstate or intrastate commerce. *Communication* includes, but is not limited to:
 - a. *Email* (a/k/a *electronic mail* or *e-mail*): an electronic means for communicating information under specified conditions, generally in the form of text messages, through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.

 - b. *Text Messages* (a/k/a *texts* or *iMessages*): a form of electronic communication involving immediate communication between two or more users through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.

 - c. *Instant Messages* (a/k/a *IM*): a form of electronic communication involving immediate communication between two or more online users; *stored IM* communications are messages that are purposely stored on a client computer.

- d. *Header information*: distribution information associated with email such as *Sender, Recipient, Subject, Date and Time, cc: (carbon copy), bcc: (blind carbon copy)*.
 - e. *Parent email, parent items, and child files*: *parent email* refers to the content and substance of an electronic communication, including *header information*; *parent items* refers to the content and substance of items such as calendars, tasks, notes, etc.; *child files* refers to files attached to *parent files* or *parent items*.
 - f. *Social Media* means electronic communication by and between correspondents connected together using media such as blogs (e.g., Twitter), content communities (e.g., YouTube), or social networks (e.g., Facebook).
- 3. “*And*,” “*or*,” and “*and/or*” shall be construed either disjunctively or conjunctively so as to bring within the scope of this CID for documents any material which might otherwise be construed as outside the scope of this CID.
 - 4. “*Relating to*” or “*relate to*” or “*discussing*” means consisting of, referring to, reflecting, supporting, evidencing, discussing, describing, embodying, memorializing, containing, constituting, including, identifying, stating, studying, reporting, commenting, analyzing, setting forth, considering, recommending, concerning, pertaining or being relevant to, in whole or in part, prepared in connection with, used in preparation for, or being in any way legally, logically, or factually connected to the matter discussed.
 - 5. “*You*” or “*your*” means Governors Management LLC.
 - 6. The singular and plural forms of any word shall be construed interchangeably.
 - 7. “*Any*” shall be construed to include “*all*,” and “*all*” shall be construed to include “*any*.”
 - 8. “*Including*” shall be construed to mean “*including, but not limited to*.”
 - 9. The “*United States*” shall be construed to mean the United States of America, its agencies, departments, and representatives.

INSTRUCTIONS

1. This CID applies to all documents in your possession, custody, or control regardless of their location and regardless of whether such material is held by your current or former employees, including facility-level personnel, mid-level management personnel, upper-level management personnel, directors, officers, in-house IT specialists and technicians, IT specialists and technicians to whom digital services have been out-sourced, consultants, representatives, agents, and any and all other persons acting on your behalf. Information and materials sought by this CID shall also include information and materials within the possession, custody, or control of any of your agents, officers, or employees, or any person acting as your representative or on your behalf.
2. Unless otherwise specified, this CID applies to all documents in your possession, custody, or control from the period **from December 1, 2019 to the date of this CID's issuance**. Documents created prior to December 1, 2019, that have been used or relied on by you since December 1, 2019, or that describe any duties, obligations, or policies that were in effect after December 1, 2019, are within the time frame of this CID.
3. The relevant time period for the information requested by written interrogatories is **from December 1, 2019 to the date of this CID's issuance**. The interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this Demand. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.
4. If you become aware that you possess, have custody or control of additional documents responsive to this CID, you shall promptly produce such additional documents.
5. If you intend to withhold from production any document based upon a claim of legal privilege, work product, or any other protection from production:
 - a. Identify with particularity and in a written log each such document by date, author(s), addressee(s), recipient(s), title, subject matter, purpose, and present custody of each and every questioned document;
 - b. State with particularity the privilege, work product principle, or other legal protection upon which you are relying in claiming each and every questioned document should be withheld from production; and
 - c. State with particularity each and every fact supporting the claim of privilege(s), work product protection, or other legal

protection(s) from production.

6. Identify all responsive documents that have been lost, discarded, destroyed, altered, or spoiled. In so doing, state: (a) the type of document; (b) the date of its creation; (c) the approximate date it was lost, discarded, destroyed, altered, or spoiled; (d) the nature of the spoliation; (e) the cause of the spoliation; (f) whether the spoliation was purposeful, inadvertent, or accidental; and, (g) the identity of each person having knowledge about the document and about its spoliation.
7. All documents provided in response to this CID are to include all marginalia and post-its, as well as any attachments referred to or incorporated by the document. To the extent that documents are found attached to other documents, by means of paper clips, staples or other means of attachment, such documents shall be produced together in the condition in which they are found. All documents should be produced in the manner and format in which they are kept in the usual course of business. If documents are stored electronically, they should be produced in electronic format. If documents are stored in multiple formats, they should be produced in each format in which they are stored.
8. All documents provided in response to this CID are to be organized in such a manner that each document responsive to a particular request is grouped together and identified as being responsive to that request.
9. If no document exists that is responsive to a request, a written statement to that effect shall be provided at the time of production.
10. All hard copy documents shall be scanned and produced in electronic format.

EXHIBIT A – INTERROGATORIES

1. Identify all of Your current and former owners, shareholders, or unit-holders, including:
 - a. for each individual owner, shareholder, or unit-holder,
 - i. their name,
 - ii. their date of birth,
 - iii. their home address,
 - iv. their business address,
 - v. their social security number,
 - vi. the class of their investment, and
 - vii. the dates they held such an interest.
 - b. for each company, corporation, partnership, proprietorship, trust, or other entity-based owner,
 - i. the entity's name,
 - ii. the entity's address,
 - iii. the class of the entity's investment, and
 - iv. all individuals You know to have a direct or indirect interest in such entity.
2. Identify all addresses where You conduct business and, for each location, summarize the nature of the business conducted there.
3. Identify Your directors and corporate officers, both former and current, including for each individual:
 - a. their name,
 - b. their date of birth,
 - c. their home address,
 - d. their business address,
 - e. their social security number,
 - f. their title,
 - g. the dates held such title, and
 - h. a description of all powers, authorities, duties, and obligations associated with such title.
4. Identify all of Your current and former employees, contractors, and volunteers.
5. Identify Your current and former corporate parents, subsidiaries, and affiliates, to the extent such entities exist, and provide information sufficient to show the corporate structure of any such entities in relation to You.

6. Identify all investments and capital contributions, including the person or entity that made the investment.
7. Identify any real property in which You have or have had an ownership, leasehold, mortgage, or security interest, including for each such property identify:
 - a. the nature of Your interest,
 - b. the date You acquired such an interest,
 - c. the seller,
 - d. manner of sale,
 - e. the purchase price you paid to acquire such interest,
 - f. the terms of any payments due by or owed to you in connection with Your interest, and
 - g. if You have sold or otherwise disposed of the interest, the date and terms under which You sold or disposed of the interest.
8. Identify by name, address, and telephone number each and every domestic and foreign bank and/or financial institution in which You have or had an account, and provide the account number, type of account, and account balance.

EXHIBIT B - DOCUMENTS TO BE PRODUCED

1. Your certificate of incorporation, bylaws, rules, regulations, procedures, and all amendments thereto.
2. Your current organizational chart.
3. A copy of each unique past organizational chart.
4. One copy of each annual or other periodic report of Your company, separately for your company and each of its divisions or subsidiaries.
5. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each board of directors of Your company and of each committee or subgroup of each board.
6. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each committee, group or subgroup of management employees of Your company, separately for your company and each of its divisions or subsidiaries.
7. All records of purchase, sale, mortgage, or lease of an interest in the properties identified in response to Interrogatory 7.
8. All power of attorney documents in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
9. All documents and communications related to any power of attorney agreements in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
10. All employment, contractor, and volunteer agreements.
11. All communications with House of Prayer Bible Seminary, House of Prayer Christian Churches of America, Inc., including their officers, members, employees, agents, and volunteers.

CERTIFICATE OF COMPLIANCE

I have responsibility for producing the documents requested in Civil Investigative Demand No. CID 2023-023. I hereby certify that all the materials required by that Civil Investigative Demand that are in the possession, custody, or control of the entities to whom the Demand is directed have been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

PROOF OF SERVICE

I, Hunter Hinton, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on 2/29/24, I served an original executed copy of Civil Investigative Demand No. 2023-023 by

(CHECK ONE)

- ☒ Personal Delivery; or
- ☐ Certified/Registered Mail

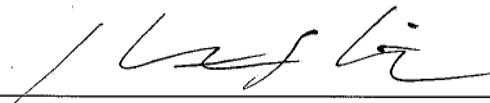
to the following:

NAME Governors Management LLC
 c/o Registered Agent Solutions, Inc.
 900 Old Roswell Lakes Pkwy., Suite 310,
 Roswell, GA, 30076

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

2/29/24

DATE



SIGNATURE



UNITED STATES OF AMERICA
U.S. DEPARTMENT OF JUSTICE

United States Attorney's Office
Southern District of Georgia

CIVIL INVESTIGATIVE DEMAND
Interrogatories and Documents

TO: The Prudential Realty LLC
60 Exchange Street, Suite C3 No. 248
Richmond Hill, GA 31324

CID No. 2023-024

This Civil Investigative Demand ("CID") is issued pursuant to the False Claims Act, 31 U.S.C. §§ 3729–3733, in the course of a False Claims Act investigation to determine whether there is or has been a violation of 31 U.S.C. § 3729, *et. seq.* This False Claims Act investigation concerns allegations that House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary, their employees, contractors, and agents, as well as other individuals or entities, violated or conspired to violate the False Claims Act by obtaining funds from the Department of Veterans Affairs for education and housing benefit programs to which they were not entitled. The general purpose of this CID is to discover information relating to these allegations and to determine whether House of Prayer Christian Churches of America, Inc. and House of Prayer Bible Seminary and their employees, contractors, and agents have violated the False Claims Act.

This is the original CID; no copies have been served on other parties.

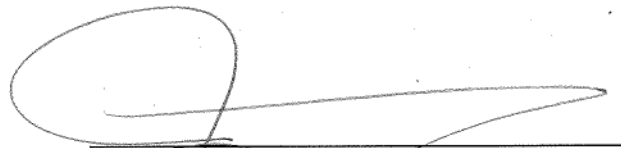
You are hereby commanded to answer in writing the written interrogatories attached hereto as "Exhibit A" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), and submit such answers to Assistant United States Attorney Bradford C. Patrick at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. The written interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this CID. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.

You are further commanded to produce a copy of requested documentation identified hereto as "Exhibit B" by no later than twenty (20) days after the day on which you receive this CID (or another date to be mutually agreed upon), to Assistant United States Attorney Bradford C. Patrick, at the United States Attorney's Office for the Southern District of Georgia, 22 Barnard Street, Suite 300, Savannah, Georgia 31401. If you object to any document request, state your objection and set forth with particularity the reasons why the document was not produced on the certificate.

The following, as well as their supervisors, will serve as False Claims Act investigators and custodians to whom such material shall be made available: Assistant United States Attorney Bradford C. Patrick.

A response to this CID, including execution and return of the attached certification, is necessary to the conduct of the investigation. Failure to comply with any of the requirements of this CID will render you liable to proceedings in the United States District Court.

Issued under the authority of 31 U.S.C. § 3733 on this 18 day of November, 2023.



JILL E. STEINBERG
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF GEORGIA

DEFINITIONS

1. *Document* means any and all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations whether preserved in *hard-paper form* or stored in *digital form* in any medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form, and includes, but is not limited to, any and all originals, copies and reproductions (except for materials that are *de-duplicated* under the terms of this CID), *archived data*, and *backup data* of all records, papers, tables, charts, appointment calendars, schedules, journals, notes, memoranda, logs, manuals, reports, minutes, notices, bulletins, financial statements, balance sheets, ledgers, contracts, agreements, promissory notes, security agreements or other negotiable instruments, telegrams, facsimiles, telexes, wire transfers, films, microfilms, photographs, video files, slides, audio recordings, transcriptions, phone records, *communications* (including, but not limited to electronic communications), voice mail, computer files, or any other information or data compilations stored in *databases* or accessible through computer or other information retrieval systems, *e.g.*, Portable Digital Assistants ("PDAs"), together with instructions and all other materials necessary to use or interpret such data compilations, and other like or similar tangible things, regardless of the means of their preparation and use.
2. *Communication* means any transmission or exchange of information between two or more persons orally or in writing, whether by chance or design, and includes, without limitation, any conversation or discussion, whether by face-to-face encounter, by regular mail or courier, by telephone, or by other means of electronic communication, whether transmitted in interstate or intrastate commerce. *Communication* includes, but is not limited to:
 - a. *Email* (a/k/a *electronic mail* or *e-mail*): an electronic means for communicating information under specified conditions, generally in the form of text messages, through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.
 - b. *Text Messages* (a/k/a *texts* or *iMessages*): a form of electronic communication involving immediate communication between two or more users through systems that will send, store, process and receive information and in which messages are held in storage until the addressee accesses them.
 - c. *Instant Messages* (a/k/a *IM*): a form of electronic communication involving immediate communication between two or more online users; *stored IM* communications are messages that are purposely stored on a client computer.

- d. *Header information*: distribution information associated with email such as *Sender, Recipient, Subject, Date and Time, cc: (carbon copy), bcc: (blind carbon copy)*.
 - e. *Parent email, parent items, and child files*: *parent email* refers to the content and substance of an electronic communication, including *header information*; *parent items* refers to the content and substance of items such as calendars, tasks, notes, etc.; *child files* refers to files attached to *parent files* or *parent items*.
 - f. *Social Media* means electronic communication by and between correspondents connected together using media such as blogs (e.g., Twitter), content communities (e.g., YouTube), or social networks (e.g., Facebook).
- 3. “*And*,” “*or*,” and “*and/or*” shall be construed either disjunctively or conjunctively so as to bring within the scope of this CID for documents any material which might otherwise be construed as outside the scope of this CID.
 - 4. “*Relating to*” or “*relate to*” or “*discussing*” means consisting of, referring to, reflecting, supporting, evidencing, discussing, describing, embodying, memorializing, containing, constituting, including, identifying, stating, studying, reporting, commenting, analyzing, setting forth, considering, recommending, concerning, pertaining or being relevant to, in whole or in part, prepared in connection with, used in preparation for, or being in any way legally, logically, or factually connected to the matter discussed.
 - 5. “*You*” or “*your*” means The Prudential Realty LLC.
 - 6. The singular and plural forms of any word shall be construed interchangeably.
 - 7. “*Any*” shall be construed to include “*all*,” and “*all*” shall be construed to include “*any*.”
 - 8. “*Including*” shall be construed to mean “*including, but not limited to*.”
 - 9. The “*United States*” shall be construed to mean the United States of America, its agencies, departments, and representatives.

INSTRUCTIONS

1. This CID applies to all documents in your possession, custody, or control regardless of their location and regardless of whether such material is held by your current or former employees, including facility-level personnel, mid-level management personnel, upper-level management personnel, directors, officers, in-house IT specialists and technicians, IT specialists and technicians to whom digital services have been out-sourced, consultants, representatives, agents, and any and all other persons acting on your behalf. Information and materials sought by this CID shall also include information and materials within the possession, custody, or control of any of your agents, officers, or employees, or any person acting as your representative or on your behalf.
2. Unless otherwise specified, this CID applies to all documents in your possession, custody, or control from the period **from December 1, 2019 to the date of this CID's issuance**. Documents created prior to December 1, 2019, that have been used or relied on by you since December 1, 2019, or that describe any duties, obligations, or policies that were in effect after December 1, 2019, are within the time frame of this CID.
3. The relevant time period for the information requested by written interrogatories is **from December 1, 2019 to the date of this CID's issuance**. The interrogatories shall be answered separately and fully in writing under oath and also shall be submitted under a sworn certificate in the form printed in this Demand. If you object to any interrogatory, state your objection and set forth with particularity the reasons why the information was not furnished on the certificate.
4. If you become aware that you possess, have custody or control of additional documents responsive to this CID, you shall promptly produce such additional documents.
5. If you intend to withhold from production any document based upon a claim of legal privilege, work product, or any other protection from production:
 - a. Identify with particularity and in a written log each such document by date, author(s), addressee(s), recipient(s), title, subject matter, purpose, and present custody of each and every questioned document;
 - b. State with particularity the privilege, work product principle, or other legal protection upon which you are relying in claiming each and every questioned document should be withheld from production; and
 - c. State with particularity each and every fact supporting the claim of privilege(s), work product protection, or other legal

protection(s) from production.

6. Identify all responsive documents that have been lost, discarded, destroyed, altered, or spoiled. In so doing, state: (a) the type of document; (b) the date of its creation; (c) the approximate date it was lost, discarded, destroyed, altered, or spoiled; (d) the nature of the spoliation; (e) the cause of the spoliation; (f) whether the spoliation was purposeful, inadvertent, or accidental; and, (g) the identity of each person having knowledge about the document and about its spoliation.
7. All documents provided in response to this CID are to include all marginalia and post-its, as well as any attachments referred to or incorporated by the document. To the extent that documents are found attached to other documents, by means of paper clips, staples or other means of attachment, such documents shall be produced together in the condition in which they are found. All documents should be produced in the manner and format in which they are kept in the usual course of business. If documents are stored electronically, they should be produced in electronic format. If documents are stored in multiple formats, they should be produced in each format in which they are stored.
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9. If no document exists that is responsive to a request, a written statement to that effect shall be provided at the time of production.
10. All hard copy documents shall be scanned and produced in electronic format.

EXHIBIT A – INTERROGATORIES

1. Identify all of Your current and former owners, shareholders, or unit-holders, including:
 - a. for each individual owner, shareholder, or unit-holder,
 - i. their name,
 - ii. their date of birth,
 - iii. their home address,
 - iv. their business address,
 - v. their social security number,
 - vi. the class of their investment, and
 - vii. the dates they held such an interest.
 - b. for each company, corporation, partnership, proprietorship, trust, or other entity-based owner,
 - i. the entity's name,
 - ii. the entity's address,
 - iii. the class of the entity's investment, and
 - iv. all individuals You know to have a direct or indirect interest in such entity.
2. Identify all addresses where You conduct business and, for each location, summarize the nature of the business conducted there.
3. Identify Your directors and corporate officers, both former and current, including for each individual:
 - a. their name,
 - b. their date of birth,
 - c. their home address,
 - d. their business address,
 - e. their social security number,
 - f. their title,
 - g. the dates held such title, and
 - h. a description of all powers, authorities, duties, and obligations associated with such title.
4. Identify all of Your current and former employees, contractors, and volunteers.
5. Identify Your current and former corporate parents, subsidiaries, and affiliates, to the extent such entities exist, and provide information sufficient to show the corporate structure of any such entities in relation to You.

6. Identify all investments and capital contributions, including the person or entity that made the investment.
7. Identify any real property in which You have or have had an ownership, leasehold, mortgage, or security interest, including for each such property identify:
 - a. the nature of Your interest,
 - b. the date You acquired such an interest,
 - c. the seller,
 - d. manner of sale,
 - e. the purchase price you paid to acquire such interest,
 - f. the terms of any payments due by or owed to you in connection with Your interest, and
 - g. if You have sold or otherwise disposed of the interest, the date and terms under which You sold or disposed of the interest.
8. Identify by name, address, and telephone number each and every domestic and foreign bank and/or financial institution in which You have or had an account, and provide the account number, type of account, and account balance.

EXHIBIT B - DOCUMENTS TO BE PRODUCED

1. Your certificate of incorporation, bylaws, rules, regulations, procedures, and all amendments thereto.
2. Your current organizational chart.
3. A copy of each unique past organizational chart.
4. One copy of each annual or other periodic report of Your company, separately for your company and each of its divisions or subsidiaries.
5. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each board of directors of Your company and of each committee or subgroup of each board.
6. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of each committee, group or subgroup of management employees of Your company, separately for your company and each of its divisions or subsidiaries.
7. All records of purchase, sale, mortgage, or lease of an interest in the properties identified in response to Interrogatory 7.
8. All power of attorney documents in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
9. All documents and communications related to any power of attorney agreements in Your possession, custody, or control, irrespective of whether You have authority or have granted authority under the power of attorney.
10. All employment, contractor, and volunteer agreements.
11. All communications with House of Prayer Bible Seminary, House of Prayer Christian Churches of America, Inc., including their officers, members, employees, agents, and volunteers.

CERTIFICATE OF COMPLIANCE

I have responsibility for producing the documents requested in Civil Investigative Demand No. CID 2023-024. I hereby certify that all the materials required by that Civil Investigative Demand that are in the possession, custody, or control of the entities to whom the Demand is directed have been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

CERTIFICATE OF COMPLIANCE

I have responsibility for answering the written interrogatories requested in Civil Investigative Demand No. CID 2023-024. I hereby certify that all information required by that Civil Investigative Demand that is in the possession, custody, control, or knowledge of the entities to whom the Demand is directed has been submitted to the designated False Claims Act investigator. If any such information has not been furnished because of a lawful objection, the objection to the interrogatory and the reasons for the objection have been stated with particularity in writing herein.

Signature _____

Printed Name _____

Title _____

SWORN TO before me, this _____ day of _____, 2023.

NOTARY PUBLIC

PROOF OF SERVICE

I, Hunter Hinton, an employee of the United States working under the direction and supervision of Assistant United States Attorney Bradford C. Patrick in connection with a False Claims Act investigation, hereby certify that on 2/29/24, I served an original executed copy of Civil Investigative Demand No. 2023-024 by

(CHECK ONE)

- ☐ Personal Delivery; or
- ☐ Certified/Registered Mail

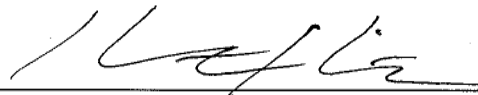
to the following:

NAME The Prudential Realty LLC
 c/o Registered Agent Solutions, Inc.
 900 Old Roswell Lakes Pkwy., Suite 310,
 Roswell, GA, 30076

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in this Proof of Service is true and correct.

2/29/24

DATE



SIGNATURE